

Damian & Valori LLP
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SEC v. PFG, LLC

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Invoice Date: July 31, 2014
End of Billing Date: Jul 31/14

Attention: Securities Exchange Commission

Client #: 676

Inv #: 10939

RE: SEC v. Aubrey Lee Price; PFG LLC et al, Case No. 1:12-cv-2296

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
May-01-14	[Asset analysis and recovery] Review insurance issues, status and strategy with counsel.	1.20	318.00	MME
	[Asset analysis and recovery] Review previous version of the complaint for prospective malpractice action.	0.10	26.50	GFG
	[Asset analysis and recovery] Conference with counsel and draft response to the FDIC-R's proposal, emails with counsel for the FDIC-R, telephone conference with the FDIC-R's counsel, Al Curley.	0.70	185.50	GFG
	[Asset analysis and recovery] Review research on receivership settlement documents with insurance companies with multiple insureds.	0.10	26.50	GFG
	[Asset analysis and recovery] Review proposed mediation agreement for prospective malpractice action (.1); emails with counsel for the SEC regarding the identity of the parties, attention to correcting the identity of the parties and other comments to the agreement (.1).	0.20	53.00	GFG
	[Asset analysis and recovery] Meet with Receiver and team members regarding status of claims against MCBI and 2012 officers and	3.50	927.50	KDM

EXHIBIT B

directors, claim against financial advisors of Montgomery Asset Management (MAM) and D&O and E&O insurance policies for MCBI and MAM, and strategize regarding negotiations with counsel for Evanston and related legal issues, including obtaining a bar order in receiverships (.7); discuss with Receiver deadlines to complete demand letter to Travelers for 2010 D&O policy and calendar deadlines (.1); review research and cases regarding bar orders in receivership cases and prepare and present to Receiver summary of research findings and case law (.8); review revised version of Settlement Agreement regarding fraudulent transfer claim against the Williams and forward to counsel for the Williams for review and approval (.3); telephone call from A. Price regarding Nelson Mullins and his request for additional documents and correspondence reflecting his communications and dealings with such former counsel to PFGBI and PFG and send email to A. Price's criminal defense counsel notifying him of his client's call and requesting permission to send documents to and discuss issues related to Nelson Mullins with A. Price (.4); email from counsel for investor with net gains accepting Receiver's counteroffer to settle fraudulent transfer claim seeking to recover net gains of investor, report acceptance of offer to Receiver, prepare and send email to counsel regarding preparation of Settlement Agreement, and coordinate preparation of Agreement (.5); email from counsel for SEC regarding Mediation Agreement and need for revision thereto and coordinate making revision (.1); confer with Receiver regarding updated investors analysis and transfers with the McSwains and exchange emails with forensic accountant regarding updates to be made to the analysis of transfers to and from investors and specific transfers to and from the McSwains (.3); review latest forensic analysis of transfers with investors and provide preliminary report to Receiver of transfers involving the McSwains (.3).

[Business operations] Receive notice from IRS regarding certain tax transcripts that we

0.10

26.50

KDM

requested for Montgomery Asset Management and coordinate revising and resubmitting Request Form (.1).

	[Case administration] Strategize with Receiver and G. Giberson regarding revision to certain terms of counteroffer to FDIC-R to resolve all disputes except those involving insurance policies and real estate, review final letter sent to counsel, and review response from counsel (.4); telephone calls to and from counsel for FDIC-R regarding clarification of certain terms presented in our counteroffer (.3).	0.70	185.50	KDM
	[Asset analysis and recovery] Review and revise Lwis complaint.	1.70	450.50	MDV
	[Asset analysis and recovery] Revise Settlement Agreement with the Williams.	0.20	30.00	AF
May-02-14	[Asset analysis and recovery] Telephone conference with counsel for the FDIC-R, Al Curley, review complaint filed against the Receiver by insurer related to the financial institution, emails with the Receiver and counsel regarding lawsuit.	0.60	159.00	GFG
	[Asset disposition] Email from realtor regarding another estimate for cleanup of Longboat Key property, review that estimate, and coordinate negotiating with original landscaper the reduction of his fee to complete the cleanup job (.1).	0.10	26.50	KDM
	[Asset analysis and recovery] Emails to and from forensic accountant regarding updated analysis of transfers to and from investors and categorizing certain transfers involving the McSwains, review the updated analysis from forensic accountant, and prepare and send summary of analysis regarding the McSwains to the Receiver (.6); email from counsel for FDIC-R regarding declaratory action filed by Travelers Insurance Company against MCBI, FDIC-R and Receiver, and strategize with Receiver, insurance counsel, other team members and counsel for FDIC-R regarding	1.20	318.00	KDM

nature of claims, whether Travelers has authority to sue Receiver prior to obtaining leave of Receivership Court, effect of stay provision in Receivership Order, and related issues, and review Complaint filed (.6).

	[Case administration] Telephone call from counsel for FDIC-R regarding certain terms of Receiver's counteroffer and receive summary of FDIC-R's position with respect to those terms, possible adjustments to certain proposed amounts and percentages, and further information that FDIC-R needs from Receiver regarding likely investor claims, and strategize with team members (.3).	0.30	79.50	KDM
	[Asset analysis and recovery] Review letter denying tax transcripts from IRS (0.1); Coordinate requesting case manager to assist with retrieve tax transcripts (0.2).	0.30	45.00	AF
	[Asset analysis and recovery] Review recent filings served upon registered agent of receivership defendant.	0.20	30.00	DMC
	[Fee and Employment Application] (No charge) Several e-mails regarding submission of invoices from professionals.	0.40	0.00	DMC
May-04-14	[Case administration] Emails with Receiver regarding transfers involving the McSwains and how they would be treated under the Receiver's proposed distribution plan and possible alternative plan pursuant to possible settlement agreement with FDIC-R (.2).	0.20	53.00	KDM
May-05-14	[Asset analysis and recovery] Review and revise mediation statement and draft of complaint against Nelson Mullins and discuss same with counsel.	1.70	450.50	MME
	[Asset analysis and recovery] Revise draft complaint against PFG's former law firm and prepare for mediation.	1.20	318.00	GFG
	[Asset analysis and recovery] Research and	2.30	609.50	GFG

further revise draft complaint against PFG's law firm, draft cover letter to the mediator.

[Asset analysis and recovery] Telephone conference with counsel for the FDIC, Alan Curley, regarding estimates about forensics and other issues related to cross claims and existing disputes and insurance claims (.5); conferences with the Receiver, Melanie Damian, and counsel, Ken Murena, regarding strategy and factual issues related to FDIC, telephone conference with Mr. Curley (.6).	1.10	291.50	GFG
[Asset analysis and recovery] Review letter and statement from Advanta IRA regarding the Thomasons' account and coordinate contacting Advanta IRA to inquire as to certain amounts reflected in statement and to obtain additional records regarding the Thomasons and other PFG investors with accounts at that company and send statement to forensic accountant (.3); review letter from representative of investor who received net gains regarding Receiver's demand letter and amounts stated to have been transferred to investor and exchange emails with forensic accountant regarding documents supporting those transfers for purposes of negotiations with counsel regarding Receiver's claims to recover net gains (.5); email from counsel for other investors with net gains regarding certain provisions of proposed Settlement Agreement and the date that Defendants became insolvent, review forensic solvency analysis and prepare, revise Settlement Agreement and send email to counsel regarding Defendant's insolvency and forwarding revised draft of Agreement (.6); email from counsel for those investors regarding additional issues related to certain provisions of the revised Settlement Agreement and prepare and send response addressing those issues and scheduling a call to resolve them (.5); strategize with team members regarding upcoming mediation with Nelson Mullins and evidence and possible information from A. Price in support of Receiver's claims against that firm (.4); assist with preparation of mediation statement for Nelson Mullins mediation (.3); follow up with	3.60	954.00	KDM

criminal counsel for A. Price regarding communications with A. Price regarding Nelson Mullins (.1); work on following up on Subpoena issued to firm that served as former auditor of MB&T and exchange telephone calls with one partner of the firm regarding responsive documents and timing of production (.3); continue working on following up on demand letters sent to fraudulent transferees and investors who received net gains and coordinate continued efforts to located certain fraudulent transferees (.5); review and revise Request to IRS for tax advocate to expedite obtaining tax transcript for certain Receivership Defendants and coordinate sending to IRS (.1).

	[Asset analysis and recovery] Strategize with Receiver and team members regarding latest call with counsel for FDIC-R regarding certain provisions in Receiver's counteroffer and responding to questions regarding likely amount of investor claims against the Estate (.4); conduct research regarding calculation of civil monetary penalties in SEC enforcement actions for purposes of determining SEC's claim against a bankruptcy estate and review articles and sections of applicable federal statute (1.4).	1.80	477.00	KDM
	[Asset analysis and recovery] Review background information regarding Lwis complaint (.7); research regarding service in Venezuela (1.7); revise complaint (.5).	2.90	768.50	MDV
	[Asset analysis and recovery] Draft Settlement Agreement with Julie Manguart.	0.30	45.00	AF
May-06-14	[Asset analysis and recovery] Attention to preparation of mediation binder (.2); attention to related materials (.1).	0.30	79.50	GFG
	[Asset analysis and recovery] Revise mediation statement and attachment; revise pursuant to comments from Receiver; review final mediation document before dispatch.	0.60	159.00	GFG

[Asset disposition] Email from the Receiver's realtor regarding his not having received the key to the Price residence and follow up with R. Price's counsel regarding the status of sending the key to the realtor (.2).	0.20	53.00	KDM
[Asset analysis and recovery] Continue working with team members on locating certain fraudulent transferees for purposes of sending demand letters to them, strategize regarding alternative means of locating them, update list of missing fraudulent transferees and tracking chart for all fraudulent transferees, and exchange emails with forensic accountant regarding information related to recipient bank accounts of those fraudulent transferees (1.4); review email and bank records from forensic accountant supporting Receiver's claim against a potential fraudulent transferee in preparation for responding to that transferee's representative (.4); telephone call to that transferee's representative regarding the Receiver's claim and supporting evidence, his response, and determining the amount the transferee may have transferred to Defendants (.3); coordinate updating of lists of investors with net gains and potential fraudulent transferees based on new information from investors and send email to forensic accountant regarding updating the forensics with such information (.2); search for and provide information and documents necessary for preparation of complaint against O. Lwis (.3); review and revise Mediation Statement for mediation with Nelson Mullins and certain documents to be attached and sign and coordinate sending to mediator with all attachments (.5); review and revise draft complaint against Nelson Mullins, confer with team members, and coordinate sending it with Mediation Statement to mediator and to Nelson Mullins (1.1); review Summons and Complaint served on PFGBI's registered agent, forward to special insurance counsel for Receiver and coordinate calendaring of response deadline (.3); email from counsel for investor with net gains regarding preparation of Settlement Agreement and coordinate revisions to Settlement Agreement (.2); confer	4.90	1,298.50	KDM

with Receiver regarding changes to proposed Settlement Agreement with certain net winning investors and send email to counsel for those investors proposing final revisions to Agreement (.2).

	[Asset analysis and recovery] Review research materials regarding service in Venezuela (.9); update Receiver regarding Lwis claims (.1); correspondence with Venezuelan counsel regarding revised draft complaint (.2).	1.20	318.00	MDV
	[Asset analysis and recovery] Continue to draft settlement agreement with Julie Manguart.	0.40	60.00	AF
May-07-14	[Asset analysis and recovery] Prepare for mediation with Nelson Mullins.	1.50	397.50	MME
	[Asset analysis and recovery] Conference with Receiver and Guy Giberson regarding factual background and analysis regarding modification for purposes of claims against Nelson Mullins.	1.00	265.00	PFV
	[Asset analysis and recovery] Review attorney production in preparation for mediation.	0.40	106.00	GFG
	[Asset disposition] Emails to and from counsel for R. Price regarding status of sending keys to house to Receiver's realtor and notify realtor of expected arrival date of keys (.2); emails with realtor regarding research regarding value of the residence and marketing plans (.2).	0.40	106.00	KDM
	[Asset analysis and recovery] Emails to and from counsel for certain investors regarding final revisions to the Settlement Agreement, make final revisions and send final draft to counsel for his clients' execution (.4); emails to and from counsel for investors regarding acceptance of final revisions and update regarding his clients' review and execution (.2); email from criminal defense counsel for A. Price regarding consent to speaking with A. Price regarding certain subjects and confer with Receiver and team members regarding	4.30	1,139.50	KDM

those subjects and various matters about which A. Price may offer assistance (.3); continue to strategize with team members regarding upcoming mediation with Nelson Mullins (.4); exchange emails with forensic accountant regarding updated report on certain fraudulent transferees and banks at which they received funds from Defendants, review that report, coordinate preparation of Subpoenas to certain banks and prepare list of documents to request (.7); provide to forensic accountant various information and updates regarding our investigations into and communications with fraudulent transferees and investors for purposes of making further revisions to master reconstruction and summary reports and request further updated forensic reports for fraudulent transferees and investors (.9); review tracking charts on fraudulent transferees and investors and coordinate further updates to reflect recent findings from investigations and settlements (.3); coordinate preparation of Subpoena and prepare document request to entity that received funds from PFG to confirm equipment purchase and rule out fraudulent transfer liability (.2); work with team members on continued search for fraudulent transferees for which we have no bank account information (.6); exchange emails with special insurance counsel and local counsel in Georgia regarding complaint filed by Travelers, deadline to respond and issues related to possible violation of stay provision in Receivership Order (.3).

[Asset analysis and recovery] Work on issues related to Scan International.	0.20	53.00	MDV
[Asset analysis and recovery] Conference with M. Visconti regarding complaint against Scan International.	0.30	45.00	AF
[Asset analysis and recovery] Email to lawyers in Guatemala regarding service on defendants in Guatemala.	0.10	15.00	AF
[Fee and Employment Application] (No charge) Review file to prepare fee application.	0.40	0.00	DMC

	[Fee and Employment Application] (No charge) Begin organizing invoices for fee application.	0.70	0.00	DMC
May-08-14	[Asset analysis and recovery] Prepare and attend mediation with Nelson Mullins.	7.50	1,987.50	MME
	[Case administration] (No charge) Travel to and from Atlanta.	4.50	0.00	MME
	[Asset analysis and recovery] Prepare for and attend mediation at the office of John Sherrill (7.5); review due diligence related document discussed during mediation, search database for related due diligence documents, revise affidavit of expert (1.0).	8.50	2,252.50	GFG
	[Asset analysis and recovery] Emails with local counsel regarding issues related to filing of court papers and appearance in new action filed by Travelers (.2); email from forensic accountant regarding change of name of accounting firm and coordinate preparation of notice to be filed with the Court (.1).	0.30	79.50	KDM
	[Asset analysis and recovery] Review updated fraudulent transferee and investor reports from forensic accountant and exchange emails with forensic accountant regarding recent revisions made to those reports and the master reconstruction and bases for adding and removing certain individuals from each list and re-categorizing them (.5); continue working with team members on locating various fraudulent transferees and working with forensic accountant on updating the information regarding those transferees and investors in the master reconstruction (2.4); coordinate preparation of demand letters to recently located fraudulent transferees and assist with locating addresses for banks at which fraudulent transferees received the transfers from Defendants (.4); review further updated reports for transferees and investors, determine necessary revisions and additions to those reports and to the master reconstruction and further re-categorization of certain individuals and entities based on recent	4.50	1,192.50	KDM

findings from investigations, and coordinate updating of those reports, master reconstruction and tracking chart to reflect new information (1.2).

	[Asset analysis and recovery] Review tracking chart and forensic reports and analysis regarding fraudulent transfer recovery actions and research addresses for certain fraudulent transferees.	2.20	583.00	CP
	[Fee and Employment Application] (No charge) Continue organizing invoices for fee application.	0.40	0.00	DMC
May-09-14	[Case administration] Telephone calls with counsel regarding FDIC proposals.	0.50	132.50	MME
	[Asset analysis and recovery] Draft demand letter to insurers regarding 2010 claims.	2.50	662.50	GFG
	[Asset analysis and recovery] Telephone conference with legal malpractice expert regarding engagement terms, revise affidavit.	0.60	159.00	GFG
	[Asset disposition] Emails with realtor regarding marketing of Longboat Key property, current asking price, and status of agreement with FDIC-R to permit sale at price below amount owed to FDIC-R (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] Emails to and from counsel for certain investors regarding their execution of Settlement Agreement with Receiver and timing of filing of Motion to approve Agreement, review that executed agreement and have and follow up on preparation of Motion to approve (.2); emails to and from forensic accountant regarding certain entities categorized as potential fraudulent transferees and status of investigation into those entities including whether A. Price opened accounts and deposited investor funds therein, and status of updating potential fraudulent transferee report (.3); emails to and from forensic accountant regarding scheduling call to discuss the	2.70	715.50	KDM

foregoing issues (.1); review latest versions of forensic reports of investors and potential fraudulent transferees, notes from meeting with A. Price and analysis of real estate counsel regarding real property transactions and continue working on investigating certain individuals and entities to determine whether they should be categorized as an investor or a fraudulent transferee (1.2); emails with local counsel in Georgia regarding calculation and calendaring of deadline to respond to Traveler's complaint in declaratory relief action and different deadline for government to respond (.1); continue working with team members on locating potential fraudulent transferees and narrow the addresses to which demand letters should be sent (.8).

[Case administration] Emails to and from counsel for FDIC-R regarding status of FDIC-R's approval of final version of Partial Settlement Agreement and Assignment Agreement and scheduling call to discuss related issue (.2); review email from counsel for FDIC-R negotiating global settlement regarding additional term to FDIC-R's settlement proposal related to the Receiver's forensics, review certain forensic reports, and strategize with Receiver and team members regarding proposed additional term (.4); email from investor Thomason regarding outcome of arbitration proceeding and status of enforcement action and Receivership and strategize regarding findings in arbitration proceeding (.3).	0.90	238.50	KDM
[Asset analysis and recovery] Continue researching addresses and forensic analysis and tracking charts for fraudulent transferees and update charts accordingly.	2.30	609.50	CP
[Asset analysis and recovery] Review responses to demand letters.	0.30	45.00	DMC
[Fee and Employment Application] (No charge) Continue compiling and reviewing invoices from several professionals for fee application.	0.70	0.00	DMC

May-11-14	[Asset analysis and recovery] Revise demand letter to the insurers (.3); research and draft response to individual defendants' motion to dismiss third amended complaint in MCBI action (5.9).	6.20	1,643.00	GFG
May-12-14	[Asset analysis and recovery] Meet with counsel and reviewing proposal from FDIC.	0.80	212.00	MME
	[Asset analysis and recovery] Research and continue drafting responses to motions to dismiss in the securities misrepresentation case regarding 2010 transaction.	7.50	1,987.50	GFG
	[Asset disposition] Email and telephone call from realtor for Longboat Key Property regarding lowering asking price, marketing the property for sale, and status of code enforcement's approval of condition of property after landscaper's clean up effort (.3); telephone call from realtor for the Price residence regarding his initial inspection of the property, certain deferred maintenance items requiring repair, and determining value of the property and whether there is equity to justify making repairs (.3).	0.60	159.00	KDM
	[Asset analysis and recovery] Telephone call with forensic accountant regarding recently discovered information regarding certain investors and fraudulent transferees and further revisions to the master reconstruction and reports on investors and fraudulent transferees to be made (.7); emails with forensic accountant regarding certain transfers that may relate to real estate transactions, investigate those transfers for purposes of property categorization in master reconstruction and email findings to forensic accountant for purposes of updating the forensics (.6); assist with preparation of complaint against SCAN International and its principals and coordinate telephone call with Jim Price regarding evidence of transfers to SCAN (.5); review and revise Motion to Approve Settlement with Williams regarding fraudulent transfers to them and proposed Order and coordinate further revisions (.4);	2.50	662.50	KDM

review and revise Settlement and Release Agreement with investors J. Manguart and coordinate confirmation of amounts and dates of transfers resulting in net gain (.3).

[Business operations] Review Power of Attorney and Declaration of Representative for tax consultant who prepared tax returns for the Estate and review tax return, discuss with Receiver and have her execute both documents, and coordinate submission to the IRS (.4).	0.40	106.00	KDM
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[Case administration] Review email from counsel for FDIC-R regarding counteroffer to our latest offer and issue related to filing of suit against A. Price, strategize with team members regarding terms agreed upon, proposed change to term capping FDIC-R's claim, and scope of stay provision in Receivership Order and review that provision (.5); telephone call from counsel for FDIC-R regarding status of FDIC-R's approval of Partial Settlement Agreement relating to real estate issues and outstanding property taxes due for Longboat Key Property ad review proposed language in agreement addressing payment of such taxes (.3); review Court's Order granting insurance companies' intervention in enforcement action but not ruling on merits of their claims and strategize with Receiver and team members regarding effect and reasoning of Order (.3); meet with Receiver and team members regarding latest settlement proposal from counsel for the FDIC-R, the pros and cons of agreeing to such settlement, the effect of such settlement on the Estate's claims and defenses, and discussing proposal with counsel for SEC (.4); emails to and from counsel for SEC to schedule call to discuss latest settlement proposal from FDIC-R and calendar call for Receiver and team members (.1); meet with Receiver regarding effect of Order granting insurance companies' motions to intervene (.2); review letter from U.S. Dept. of Justice regarding trial date and related matters in criminal action against A. Price, confer with team members regarding receiving notices of Court filings in	2.10	556.50	KDM
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that action, and coordinate calendaring of trial date and contacting Clerk to obtain electronic notice of all Court filings (.3).

[Asset analysis and recovery] Strategize regarding Scan International case.	0.10	26.50	MDV
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[Asset analysis and recovery] Draft motion to approve Settlement Agreement (0.8); Revise motion to approve settlement (0.5).	1.30	195.00	AF
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[Asset analysis and recovery] Draft complaint against SCAN International and its principals.	1.60	240.00	AF
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[Asset analysis and recovery] Phone call with Mr. Mesa from the IRS regarding our request for tax return transcripts.	0.30	45.00	AF
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[Asset analysis and recovery] Phone call to Jim Price regarding transfers to SCAN.	0.20	30.00	AF
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[Asset analysis and recovery] Review documents submitted by forensic accountant corresponding to transactions related to A&D Hospitality, Anfe Woodrum and Adam van Nut [0.9]; work on demand letters to A &D Hospitality and its principal [0.7].	1.60	240.00	DMC
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[Fee and Employment Application] (No charge) Review invoices from Receiver's professionals and time entries, revise and prepare summaries of work performed by each professional for fee application.	2.30	0.00	DMC
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May-13-14 [Case administration] Meet with counsel regarding FDIC agreement (.4); telephone call with counsel and SEC regarding FDIC (.4).	0.80	212.00	MME
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[Asset analysis and recovery] Telephone conference with John Sherrill regarding the possibility of a mediated settlement (0.2); conference with the Receiver regarding requirements of settlement (0.2); further work on expert's affidavit and review expert file (0.1), telephone conference with expert (0.1).	0.60	159.00	GFG
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<p>[Asset analysis and recovery] Review updated reports for investors and fraudulent transferees from forensic accountant incorporating revisions based on recent findings and exchange emails with forensic accountant requesting further revisions to the investors report (.8); review statute of limitations report and coordinate determination of statute of limitations for those fraudulent transferees and net winning investors that have been added to the latest forensic reports (.2); strategize with Receiver and team members regarding updated forensic reports on investors and fraudulent transferees (.3); review documents related to claims of the McSwains for purposes of updating the amounts they invested and received back on the forensic reports (.2); meet with Receiver and team members and conference call with counsel for SEC regarding latest settlement proposal from FDIC-R, pros and cons, and effect on the Receiver's claims against third parties, the Receivership Estate, and the investors' claims (.9); strategize with Receiver and team members regarding the demand letter for 2010 D&O insurance policy and evidence in support of arguments to be asserted (.5); strategize with team members regarding response to Motion to Dismiss complaint in action against MCBI and officers and directors (.4); strategize with Receiver and team members regarding responding to Traveler's complaint in declaratory action and coordinating with special insurance counsel preparation of response, exchange emails with special insurance counsel regarding response, and schedule conference call to further discuss response (.4); review Intervention Complaints filed by Protective Life and Genworth and strategize with Receiver and team members regarding preparation of responses (1.0); review proposed response to counsel for FDIC-R with revisions to latest settlement proposal and strategize with team members regarding those revisions and further clarification of terms of the agreement (.5).</p>	5.20	1,378.00	KDM
<p>[Case administration] Coordinate updating of our investor list based on recent findings of the</p>	0.30	79.50	KDM

forensic accountant regarding the nature of certain transfers between investors and Defendants, review updated list and reconcile with latest forensic report on investors (.3).

[Asset analysis and recovery] Research rule regarding filing response to intervening complaint (0.4); Review intervening complaints (0.3); work on formulating case strategy and filing answer to complaints (0.3); Research regarding elements for declaratory judgment (0.7).	1.70	255.00	AF
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May-14-14	[Asset analysis and recovery] Review and revise complaint against Osama Lwis.	1.00	265.00	MME
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[Asset analysis and recovery] Conference with Melanie Damian and Kenneth Murena regarding FDIC settlement.	0.40	106.00	PFV
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[Asset analysis and recovery] Telephone conference with Steven Powell.	0.50	132.50	GFG
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[Asset analysis and recovery] Revise proposed Settlement and Release Agreement with investor Manguart and forward to her counsel for review and approval (.4); assist with preparation of Response to Motion to Dismiss Third Amended Complaint against MCBI and officers and directors, including Declarations to be obtained from various persons including Powell and Price and strategize regarding preparation of those Declarations and obtaining consent from Price's criminal counsel (.7); emails to and from criminal counsel for Price regarding consent to execution of Declaration in support of Response to Motion to Dismiss and confer with team members (.2); telephone calls to and C. Roland regarding his letter responding to our demand letters to him and his mother, our evidence in support of Receiver's claims, and evidence he will search for demonstrating his and his mother's investments (.6); review and send to C. Roland evidence in support of Receiver's claims (.4); emails with forensic accountant regarding additional revisions to master reconstruction and investors report	3.80	1,007.00	KDM
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based on recent investigation of certain investors and information from the McSwains, review updated investor report, and strategize regarding further investigation required to confirm amounts and investors to whom certain amounts should be credited (.6); continue working with team members on locating certain potential fraudulent transferees, review updated tracking chart with new addresses, and coordinate sending demand letters to those transferees for which new addresses were discovered (.7); strategize with team members regarding J. Zegalia (.2).

[Case administration] Meet with Receiver and team members regarding issues related to proposed Settlement Agreement with FDIC-R and certain minor revisions to propose to counsel for FDIC-R and review email to counsel outlining those minor revisions (.4); coordinate preparation of Motion for extension of time to file Reply in support of Receiver's Motion to approve claims process and distribution plan (.1).	0.50	132.50	KDM
[Asset analysis and recovery] Review investor summary to determine whether Julie Manguart is a net winner.	0.10	15.00	AF
[Asset analysis and recovery] Research regarding elements for declaratory judgment.	0.20	30.00	AF
[Asset analysis and recovery] Research regarding standing for claim against auditor (2.5); Draft email memo to G.Giberson regarding standing for misrepresentation claim against auditor (0.5).	3.00	450.00	AF
[Asset analysis and recovery] Prepare exhibits to demand letters intended for certain of potential fraudulent transferees based on forensic analyses.	1.20	180.00	DMC
[Fee and Employment Application] (No charge) Continue gathering and reviewing invoices from professionals [0.9]; work on fee application [2.0].	2.90	0.00	DMC

May-15-14	[Asset analysis and recovery] Telephone call with counsel in Venezuela regarding status and strategy.	0.50	132.50	MME
	[Asset analysis and recovery] Telephone conference with Bill Wood regarding the tolling agreement.	0.10	26.50	GFG
	[Asset analysis and recovery] Telephone conference with investor Gary Shirley.	0.30	79.50	GFG
	[Asset disposition] Telephone call from realtor regarding completion of landscaping and cleanup of the Longboat Key property and confirmation by Code Enforcement that the property is in compliance (.2); emails with realtor regarding authorization form to lower the asking price for the Longboat Key property, review that form, have the Receiver review and execute it, and return executed copy to realtor (.3); review Notice from Town of Longboat Key and discuss with realtor to determine whether and how issues to be addressed at Public Meeting may affect the property (.2).	0.70	185.50	KDM
	[Asset analysis and recovery] Telephone call from investor regarding his efforts to gather documents to prove the amounts that he and his mother invested with PFG, LLC (.2); multiple meetings with Receiver and team members to discuss strategy and claims to be alleged in Complaint against SCAN and its principals, strategy for responding to Intervenor Complaints filed by life insurance companies, status of Response to Motion to Dismiss Third Amended Complaint in action against MCBI and officers and directors, and demand letter to insurance company for 2010 claims (.7); review Intervention Complaint filed by Household Life (.3); coordinate calculation and calendaring of deadlines to respond to all three Complaints filed by life insurance companies (.1); strategize with team members regarding Answer and Defenses to be prepared in response to those Complaints (.8); emails to and from special insurance counsel regarding declaratory relief action brought by	3.40	901.00	KDM

insurance company who issued the fidelity bond and confirmation of teleconference, and confer with Receiver regarding involvement of special insurance counsel (.2); review summary memorandum regarding call from counsel for Genworth Insurance Company regarding its Complaint in Intervention, procedural and scheduling issues, and a exploring a framework for settlement negotiations in conjunction with the two other life insurance companies, and strategize with team members regarding these issues (.6); emails with Jim Price regarding information needed from A. Price and arranging for a telephone call (.2); emails to and from Jim Price regarding recent communications between R. Price and attorney for the lender regarding a possible foreclosure of mortgage on the Price residence and attempt to contact lender to invoke the District Court's stay against all actions against Receivership Estate property including foreclosure (.3).

[Case administration] Emails to and from counsel for FDIC-R regarding acceptance of our latest proposed changes to the settlement proposal and confer with Receiver and team members regarding acceptance and memorializing settlement terms in a written agreement (.6); emails to and from counsel for SEC regarding agreement reached with the FDIC-R and need to seek further extension of time to file Reply in support of Motion to approve claims process and distribution plan while we finalize the settlement agreement and obtain the necessary approvals from the FDIC and the Court (.3); prepare Motion for extension of time and proposed Order, revise and finalize based on communications with counsel for the FDIC-R and counsel for the SEC, and coordinate filing with the Court (.6); telephone call from counsel for FDIC-R regarding real estate agreement and remaining approvals to obtain (.2); confer with Receiver regarding trial set in criminal action against A. Price and informing the investors through the receivership website and send trial information to website manager to post to website (.2).

1.90

503.50

KDM

	[Asset analysis and recovery] Review edits regarding complaint against O. Lwis from J. Pate and M. Damian (.4); revise complaint (.4); correspondence with J. Pate (.1); review analysis regarding fraudulent transfers (.6); phone conference with Venezuelan counsel (.5).	2.00	530.00	MDV
	[Asset analysis and recovery] Conference regarding omission of Powell reports by auditors (0.1). Research regarding standard for proving omissions (2.3); Research regarding common law fraud for sale of securities (0.7).	3.10	465.00	AF
	[Asset analysis and recovery] Phone call with Price regarding transfers to SCAN International.	0.20	30.00	AF
	[Asset analysis and recovery] Continue preparing exhibits to demand letters intended for certain potential fraudulent transferees as reflected in forensic analyses.	0.60	90.00	DMC
	[Fee and Employment Application] (No charge) Work on fee application.	2.00	0.00	DMC
May-16-14	[Asset analysis and recovery] Review and revise demand letter (.4); telephone call with counsel and insurance counsel regarding status and strategy (.6).	1.00	265.00	MME
	[Asset analysis and recovery] Continue drafting response to the Motion to Dismiss filed by the Individuals (outline legal arguments, research regarding common law, draft responses).	3.50	927.50	GFG
	[Asset disposition] Telephone call and emails from realtor regarding marketing budget and strategy for Longboat Key property (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] Confer with Receiver and team members regarding status of extending tolling agreement with Nelson Mullins, preparation of complaint for malpractice, preparation of affidavit of expert in support of Receiver's malpractice claims,	2.80	742.00	KDM

and new agreement with expert (.3); review agreement with expert and strategize regarding affidavit in support of Receiver's claims (.3); telephone call to counsel for R. Price regarding communications between counsel for Amerisave and R. Price regarding intention of lender to foreclose on the Price residence, review letter from counsel to R. Price regarding foreclosure, send Receivership Order to invoke the stay against litigation on Estate assets, and exchange telephone calls with counsel for lender regarding the receivership and the stay provision (.7); meet and strategize with Receiver, special insurance counsel and team members regarding demand letter to insurance company under the 2010 D&O policy, Response to Individual Defendants' Motion to Dismiss Third Amended Complaint, responding to Complaints in Intervention filed by life insurance companies, and responding to Traveler's declaratory relief complain on the financial institution bond (.9); confirm deadline to respond to declaratory relief complaint and calendaring of deadline (.1); telephone call from counsel for FDIC-R regarding provision of settlement agreement related to dismissal without prejudice of action against FDIC-R in S.D. Ga. and FDIC-R's agreement to toll the statutory deadline to file such action, alternative provision to stay or abate that action during the FDIC-R's action against broker-dealer and similar staying or abatement of MCBF's action against FDIC-R (.3); telephone call to counsel for FDIC-R in that S.D. Ga. action regarding preparing and filing motion to stay or abate that action consistent with the terms of the proposed new provision to the settlement agreement (.2).

[Case administration] Follow up with website manager regarding posting on the website of trial information for criminal action against A. Price, review website to confirm posting and report status to Receiver (.3); review Order granting Agreed Motion for extension of time to file Reply in support of Receiver's Motion to approve claims process and distribution

0.50

132.50

KDM

plan, confer with Receiver and coordinate calendaring of new deadline (.2).

[Asset analysis and recovery] Research regarding common law fraud for sale of securities (0.8); Email to Giberson summarizing case law regarding common law fraud (0.4).	1.20	180.00	AF
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[Asset analysis and recovery] Continue working on demand letters to investors with net gains.	0.40	60.00	DMC
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May-19-14	[Asset analysis and recovery] Review and revise Demand Letter to Insurance carrier.	0.80	212.00	MME
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[Asset analysis and recovery] Revise response to the Motion to Dismiss (individuals) (drafting legal arguments regarding common law claims).	2.90	768.50	GFG
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[Asset disposition] Emails to and from realtor for Price Residence regarding recommended repairs to the house and fair market value analysis based tax assessed value and recent sales of comparable houses in the neighborhood, review that analysis and pictures of disrepair, and strategize regarding setting the asking price based on the fair market value and encumbrances on the property including the mortgage and tax liability (.6); request that realtor determine the tax liability (.1).	0.70	185.50	KDM
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[Asset analysis and recovery] Coordinate preparation of letters to potential fraudulent transferees at recently discovered addresses, review and finalize those letters and attached summary forensic analysis and coordinate sending of letters (.4); review initial draft of Response to Individual Defendants' Motion to Dismiss Third Amended Complaint, assist team members with further revisions to Response, and strategize regarding different arguments to be made in Response to MCBF's Motion to Dismiss (1.8); strategize with team members regarding evidence being gathered from various witnesses in support of the	4.10	1,086.50	KDM
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Receiver's claims against MCBI and its officers and directors (.4); emails with Receiver and special insurance counsel regarding proposed demand letter to MCBI, its officers and directors and the insurance companies and review and revise draft of demand letter and circulate to team members and request revisions and approval by special insurance counsel (.9); strategize regarding preparation of motion to dismiss Traveler's complaint for declaratory relief as to the financial institution bond (.4); exchange emails with Receiver regarding requesting extension of time to respond to that complaint (.2).

[Asset analysis and recovery] Correspondence with defense counsel regarding service in Venezuela and with Receiver regarding same (.3).	0.30	79.50	MDV
[Asset analysis and recovery] Review, edit, and add citations to draft of Plaintiff's Memorandum of Law in Opposition to Motion to Dismiss.	2.80	420.00	AF
[Asset analysis and recovery] Conference regarding transfers to SCAN from PFG Bank of America Account (0.2); Conference with K. Murena regarding answers to life insurance claims (0.1).	0.30	45.00	AF
[Asset analysis and recovery] Research regarding service of process in Guatemala for purposes of action against Scan International.	1.10	165.00	AF
[Asset analysis and recovery] Continue preparing exhibits of forensic analysis to attach to demand letters to potential fraudulent transferees.	0.50	75.00	DMC
[Fee and Employment Application] (No charge) Continue gathering invoices [0.3]; emails with professionals regarding submission of invoices [0.4]; work on fee application [1.4].	2.10	315.00	DMC

	[Asset analysis and recovery] Prepare and finalize demand letters to additional targets for attorney K. Murena's review.	1.00	75.00	pl
May-20-14	[Asset analysis and recovery] (KM Homes) Email regarding settlement proposal.	0.10	26.50	PFV
	[Asset analysis and recovery] Research and revise response to individuals' motion to dismiss third amended complaint in action against MCBI and its directors and officers.	6.50	1,722.50	GFG
	[Asset analysis and recovery] Telephone conference with insurance counsel, the Receiver and co-counsel regarding outstanding issues, including insurance related issues, revise insurance demand letter and dispatch.	1.30	344.50	GFG
	[Asset disposition] Emails to and from realtor for Price Residence regarding whether there are outstanding property taxes and homeowner's association fees due (.1).	0.10	26.50	KDM
	[Asset analysis and recovery] Email from Receiver regarding revision to Response to Individual Defendants' Motion to Dismiss Third Amended Complaint, strategize with team members, and coordinate sending draft to special insurance counsel (.3); emails with Receiver regarding requesting extension of time to respond to complaint in Traveler's declaratory relief action (.1); exchange email with counsel for Travelers in declaratory relief action regarding extension of time to respond to Complaint (.2); telephone calls to and from counsel for Travelers regarding extension of time to respond to Complaint and procedural and scheduling matters in declaratory relief action and experience with this judge and coordinate preparation of Motion for extension of time (.4); continue working with team members with further revisions to Response to Individual Defendants' Motion to Dismiss Third Amended Complaint and developing additional arguments for Response to MCBI's Motion to Dismiss and coordinate sending updated draft of Response to special insurance counsel (1.2); continue assisting with	3.90	1,033.50	KDM

formulating defenses and affirmative defenses for Answer to life insurance companies' complaints in intervention (.3); review letter from investor and potential fraudulent transferee regarding evidence of alleged transfers from him to A. Price and his efforts to gather similar evidence of his mother's transfers to A. Price and review evidence provided and forward to forensic accountant for review and possible incorporation into master reconstruction (.5); strategize with team members regarding expert for claim against Nelson Mullins, review Receivership Order for purposes of confirming authority to retain experts for litigation matters, and prepare and send analysis to Receiver (.9).

[Asset analysis and recovery] (KM Homes) Follow up on timing of KM Homes payment of settlement amount (.1).	0.10	26.50	KDM
[Case administration] Emails to and from counsel for FDIC-R regarding proposed Joint Motion for administrative closure of Receiver's action against FDIC-R to pursue claims against MB&T Estate to be filed with the Court in connection with global settlement with FDIC-R, strategize with team members, and begin reviewing proposed Joint Motion (.5).	0.50	132.50	KDM
[Asset analysis and recovery] Correspondence with Venezuelan counsel regarding research regarding adding claims in complaint against Lwis regarding La Yaguarita (.2).	0.20	53.00	MDV
[Asset analysis and recovery] MCBI: Conference regarding misstatement of ALLL by bank as common law fraud or negligent misrepresentation (0.1); Research regarding misstatement of ALLL as common law fraud or misrepresentation (2.2).	2.30	345.00	AF
[Asset analysis and recovery] Review correspondence from potential fraudulent transferee.	0.20	30.00	DMC

	[Asset analysis and recovery] Continue working on forensic analyses exhibits to demand letters to potential fraudulent transferees.	1.50	225.00	DMC
	[Fee and Employment Application] (No charge) E-mails with professionals requesting invoices for application.	0.30	0.00	DMC
May-21-14	[Asset analysis and recovery] Revise legal arguments sections to individuals' motion to dismiss and work on response to companies motion to dismiss in MCBI action.	2.20	583.00	GFG
	[Asset disposition] Emails to and from realtor for Price residence regarding communications with the HOA and amount of HOA fees due and setting the asking price for purposes of listing the property for sale (.2); review letter from counsel for R. Price forwarding Quit Claim Deed and letter from counsel for Amerisave and review Deed and letter from Amerisave's counsel (.3).	0.50	132.50	KDM
	[Asset analysis and recovery] Multiple emails to and from counsel for FDIC-R regarding Joint Motion to administratively close case in S.D. Ga., status of Receiver's approval thereof, and contacting the Court to alert it of the parties' intention to file the motion or otherwise seek to extend deadlines or stay the action (.4); prepare and send email to Receiver forwarding the proposed Joint Motion, along with an Order entered in the MCBI action against the FDIC-R administratively closing the case, summarizing that order and the proposed Joint Motion, discussing the upcoming deadline for the FDIC-R to respond to our Amended Complaint, and explaining the benefits of Administratively closing the case on its own and in the context of our prospective settlement agreement with the FDIC-R (.3); work with team members on reviewing master reconstruction of all accounts of Defendants for purposes of creating a list of transfers that may involve Scan International and review various versions	2.40	636.00	KDM

of list of transfers and provide input regarding further narrowing of list (1.7).

[Asset analysis and recovery] Correspondence with Venezuelan counsel regarding following up regarding Complaint against O. Lwis.	0.20	53.00	MDV
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[Asset analysis and recovery] Create spreadsheet with transfers from PFG Bank of America account from 2010 and 2011 for purposes of claims against Scan International.	3.90	585.00	AF
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May-22-14	[Asset analysis and recovery] Review and revise response to Motion to Dismiss in MCBI action.	1.00	265.00	MME
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[Asset analysis and recovery] Emails regarding proposed order on administrative closure of action against FDIC-R, review proposed order and proposed joint motion.	0.30	79.50	GFG
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[Asset disposition] Emails to and from realtor for Price residence regarding the cleaning and maintenance needed on the house prior to showing it potential purchasers and coordinate obtaining estimates for the clean-up and landscaping (.2).	0.20	53.00	KDM
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[Asset analysis and recovery] Multiple emails to and from counsel for FDIC-R regarding Receiver's consideration of proposed Motion for Administrative Closure, proposed Order and possible need to call with Court to alert it of the parties' intention to file such Motion (.3); review and revise proposed Order administratively closing the case and exchange emails and telephone calls with counsel for FDIC-R regarding revisions to Motion and the proposed Order (.5); prepare and send emails to the Receiver regarding the proposed Order with my revisions and making similar revisions to the Motion (.2); email from counsel for J. Manguart regarding status of her consideration of our proposed Settlement and Release Agreement (.1); telephone call to recipient of demand letter for return of fraudulent transfers and request proof of identity to confirm that recipient is not the	2.40	636.00	KDM
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correct transferee (.2); telephone call from investor who received demand letter regarding her investments with A. Price and gathering evidence of those investments to demonstrate that she lost money and coordinate updating of tracking chart with contact information and other information from call (.3); work with team members on following up with persons who received demand letters for return of net gains or fraudulent transfers and coordinate further calls to those investors and transferees and updating of tracking chart (.4); strategize regarding the first date that statute of limitations will expire for investors with net gains and fraudulent transferees and coordinate preparation of Complaint to avoid fraudulent transfers (.4).

[Asset analysis and recovery] (KM Homes) Follow up with counsel for KM Homes regarding initial payment due under Settlement Agreement (.1).	0.10	26.50	KDM
[Asset analysis and recovery] Revise O. Lwis Complaint pursuant to Venezuelan counsel's comments (.5); update regarding SCAN International issue regarding other payments (.1); review memorandum from Venezuelan counsel regarding service of process (.3); correspondence with Venezuelan counsel (.2).	1.10	291.50	MDV
[Asset analysis and recovery] Review signed stipulation agreement and revise motion to approve settlement (0.2).	0.20	30.00	AF
[Asset analysis and recovery] Review response to Insurance Companies motion to intervene and draft answer and defenses to Protective Life Insurance's Complaint in Intervention (3.2); Research regarding pleading requirements for declaratory judgment action (1.0).	4.20	630.00	AF
[Asset analysis and recovery] Revise spreadsheet with transfers from Bank of America account (1.5); Draft letter to Price regarding possible transfers to SCAN (0.2); Coordinate mailing letter to Price (0.1).	1.80	270.00	AF

	[Fee and Employment Application] (No charge) Continue working on fee application.	1.20	0.00	DMC
	[Fee and Employment Application] (No charge) Send emails to continue gathering invoices from all associate counsel and professionals for fee application.	0.50	0.00	DMC
May-23-14	[Asset analysis and recovery] Telephone conference with opposing counsel, Robert Waddell, regarding motion to administratively close case (0.4); research administrative closure and emails and telephone conferences with counsel, Ken Murena, regarding changes to motion and proposed order in administrative closure in S.D. of Georgia case (1.4); work on proposed revisions (0.2); emails and telephone conference with counsel for FDIC, Mr. Curley, regarding administrative closure, further telephone conferences with Mr. Waddell and emails and telephone conferences with the Receiver (0.6).	2.70	715.50	GFG
	[Asset analysis and recovery] Revise response to company's motion to dismiss third amended complaint in action against MCBI (0.4); conference regarding research on safe harbor and forward looking statements (1.0); review research regarding safe harbor and revise response to individuals' motion to dismiss pursuant to comments of the Receiver (0.5).	2.90	768.50	GFG
	[Asset analysis and recovery] Telephone calls and emails to and from special insurance counsel regarding deadline to respond to Complaint filed by Travelers in declaratory relief action and filing of motion for extension of time (.2); confirm deadline and exchange emails with counsel for Travelers regarding additional time to file response (.2); prepare motion for extension of time and proposed order and send to counsel for Travelers for approval (.4); emails with local counsel regarding filing of motion for extension, make final revisions to motion and send final version and proposed order to local counsel for filing (.3); receive report regarding status of follow-up calls to recipients of letters	1.50	397.50	KDM

demanding return of net gains or fraudulent transfers and efforts to obtain telephone numbers for some of them and strategize regarding communications with those recipients (.4).

[Asset analysis and recovery] (KM Homes) Receive confirmation from bank of receipt of initial payment from KM Homes due under the Settlement Agreement (.1); review email from mediator regarding status of payment and coordinate payment of balance (.1).	0.20	53.00	KDM
[Case administration] Multiple emails with Receiver and team members regarding FDIC-R's proposed Joint Motion for administrative closure of Receiver's action against the FDIC-R and proposed order, law and rules applicable to administrative closure, and strategy for revisions and additions to be made to the Joint Motion and the Order that preserve the rights and defenses of the parties (.8); exchange multiple emails with counsel for the FDIC-R regarding revisions to the Joint Motion and proposed Order and Receiver's approval thereof (.4); work with Receiver and team members on revising and adding language to the Joint Motion and proposed Order to preserve the rights and defenses of the parties (.6); emails with counsel for the FDIC-R regarding final revision to the Joint Motion, confer with team members, and confirm approval for filing (.3).	2.10	556.50	KDM
[Asset analysis and recovery] Research regarding stating jurisdiction for declaratory judgment action (1.0); Continue to draft answer and defenses to Protective Life Ins. Co's Complaint in Intervention (0.6).	1.60	240.00	AF
[Asset analysis and recovery] Phone call with Mr. Mesa regarding available tax transcripts for PFG, PFGBI, and Montgomery Asset Management (0.3); Review and revise letter to Mr. Mesa regarding request for available tax transcripts (0.1).	0.40	60.00	AF

	[Asset analysis and recovery] Reserach regarding safe harbor for forward looking statements under common law fraud.	2.00	300.00	AF
	Research regarding misrepretation of ALLL as basis for common law claim for fraud or negligent misrepresentation (1.0).	1.00	150.00	AF
May-24-14	[Asset analysis and recovery] Multiple emails from potential fraudulent transferee who received our demand letter with explanation of her alleged investment and involvement with A.L. Price and her alleged losses and supporting documents and correspondence and begin reviewing those documents (.8).	0.80	212.00	KDM
May-25-14	[Asset analysis and recovery] Research and revise individuals' motion to dismiss third amended complaint (legal arguments regarding misstatements (2.5); responses to arguments in motion to dismiss) (3.6).	6.10	1,616.50	GFG
	[Asset analysis and recovery] Email from counsel for FDIC-R regarding final version of Joint Motion for Administrative Closure of action against FDIC-R and proposed Order approved by the FDIC-R and review that version that was filed with the Court (.2).	0.20	53.00	KDM
May-26-14	[Asset analysis and recovery] Conduct research and revise response to individuals' motion to dismiss in action against MCBI (common law claims).	9.40	2,491.00	GFG
	[Case administration] (No charge) Review and revise invoices of counsel for the Receiver (5.0).	5.00	0.00	KDM
	[Asset analysis and recovery] Work on demand letters to remaining potential fraudulent transferees, and prepare forensic analyses for use as exhibits.	0.90	135.00	DMC
	[Asset analysis and recovery] Review basis for filing complaints against potential fraudulent transferees and research regarding fraudulent	1.20	180.00	DMC

transfers under Georgia code in order to prepare complaints.

May-27-14	[Asset analysis and recovery] Revise Osama Lwis complaint.	0.20	53.00	MME
	[Case administration] (No charge) Review billing records for fee application.	2.00	0.00	MME
	[Asset analysis and recovery] Research and revise responses to motions to dismiss in MCBI action (reliance and 10b5 issues).	6.90	1,828.50	GFG
	[Asset analysis and recovery] Draft revised tolling agreement, emails with in house counsel regarding tolling agreement.	0.30	79.50	GFG
	[Asset analysis and recovery] (MCBI Action) Strategize with Receiver regarding revisions to Response to Individual Defendants' Motion to Dismiss and follow up with various team members, including special insurance counsel, regarding their input and revisions and overall strategy of the Response (.5); work with team members on refining arguments being made in Response brief and assist with revising that brief (1.5); emails to and from special insurance counsel regarding the Response brief (.2); meet with Receiver and team members regarding requesting extension of time to file Response brief, follow up on obtaining extension from counsel for Defendants, report to Receiver Defendants' consent to requested extension, and review Motion to approve extension of time (.2).	2.40	636.00	KDM
	[Asset analysis and recovery] Email from counsel for investor Manguart regarding her agreement to the form of the proposed Settlement Agreement and coordinate preparation of Motion to Approve (.2); continue reviewing correspondence and documents from fraudulent transferee who received our demand letter regarding her involvement and investments with A.L. Price and her alleged losses (.3); follow up with Receiver regarding review and approval of	0.80	212.00	KDM

Motion to approve settlement agreement with potential fraudulent transferee (.1); review letters and picture IDs of certain recipients of demand letters and coordinate sending to A. Price to confirm that they are not the recipients of any transfers from Defendants (.2).

<p>[Case administration] (FDIC-R Action) Emails to and from counsel for FDIC-R regarding proposed Joint Motion for extension of time for FDIC-R to file response to Amended Complaint in light of recent filing of Joint Motion for Administrative Closure of the Case, confer with the Receiver regarding the proposed extension of time, review proposed Joint Motion, and provide comments and revisions (.4); review revised version of Joint Motion for extension adopting certain of my proposed revisions and confer with team members regarding sufficiency of revision (.2); emails to and from counsel for FDIC-R regarding proposed Order granting Joint Motion for extension and approve form of that Order (.1); emails to and from counsel for FDIC-R regarding joint conference call with the Court to request a Status Conference to discuss the status of the case and our settlement negotiations, and our Joint Motion for Administrative Closure and Joint Motion for extension of time (.2).</p>	0.90	238.50	KDM
<p>[Case administration] (No charge) Discuss with Receiver Seventh Interim Fee Application and proposed revisions to our invoices and follow up on preparation of Seventh Fee Application (.4).</p>	0.40	0.00	KDM
<p>[Asset analysis and recovery] Review Venezuelan counsel's questions and comments regarding Lwis complaint and discuss with Receiver (.3); revise complaint (.3); correspondence with Venezuelan counsel (.1).</p>	0.70	185.50	MDV
<p>[Asset analysis and recovery] Life Insurance Claims: Research economic loss doctrine in Georgia (0.8); Research regarding suit in equity when there is an adequate legal remedy (0.7); Continue to draft Answer and Defenses</p>	1.80	270.00	AF

to Protective Life Ins. Co.'s Complaint in Intervention (0.3).

[Asset analysis and recovery] Draft motion to approve settlement agreement with Julie Manguart.	0.40	60.00	AF
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[Asset analysis and recovery] MCBI: Research regarding motion to dismiss based on failure to plead reliance (1.0); Research regarding court can only look to four corners of complaint in deciding motion to dismiss (0.6).	1.60	240.00	AF
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[Fee and Employment Application] (No charge) Continue to gather remaining bills [0.4] revise fee application [0.8].	1.20	0.00	DMC
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[Asset analysis and recovery] Telephone call followed by email to opposing counsel in the MCBI action regarding request for extension of time to respond to Defendants' Motions to Dismiss (.2); draft Unopposed Motion for Extension of Time to Respond to Defendants' Motions to Dismiss and proposed order regarding same for attorney G. Giberson's review (.3); file motion electronically (.1)	0.60	45.00	pl
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May-28-14	[Asset analysis and recovery] Review and revise motion to approve settlement and release agreement (.6); review individual directors motion to dismiss in MCBI action and review and revise response (2.2); review insurance counsel comments to demand letter and e-mail with counsel regarding same (.6).	3.40	901.00	MME
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[Asset analysis and recovery] Work on review of response to motion to dismiss in MCBI action.	0.40	106.00	PFV
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[Asset analysis and recovery] Emails with counsel for former PFG law firm regarding tolling agreement (.1); emails regarding status of legal malpractice negotiations (.1); review comments of insurance counsel to demand letter (.1).	0.30	79.50	GFG
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[Asset analysis and recovery] Review revised motion for extension in S.D. of Georgia case (0.2); telephone conferences with counsel for the FDIC, Robert Waddell, regarding motion for extension of time and the Court's consideration of same (0.2); conference with local counsel, Roy Paul, regarding strategy (0.2); telephone conference with Mr. Waddell regarding advice of local counsel and strategy, telephone conference with FDIC's counsel regarding entry of order (0.7).	1.30	344.50	GFG
[Asset analysis and recovery] Review redlined demand letter, emails with insurance counsel regarding bad faith related issues.	0.60	159.00	GFG
[Asset analysis and recovery] Prepare and send email to counsel for SEC summarizing settlements reached with certain winners and seeking approval thereof (.2); confer with Receiver regarding Motion to approve settlement of claim against certain winners and coordinate making final revisions to that Motion and filing the Motion (.3); review and revise Answer, Defenses and Affirmative Defenses to Protective Life's Complaint in Intervention, coordinate further revisions to certain Affirmative Defenses and sent to special insurance counsel for review and input (.7).	1.20	318.00	KDM
[Asset analysis and recovery] (MCBI Action) Continue developing agreements and assisting with revisions to Response to Defendants' Motion to Dismiss Third Amended Complaint (1.8); review portion of motion to dismiss and caselaw cited therein (.3).	2.10	556.50	KDM
[Case administration] Review and revise Seventh Interim Fee Application and coordinate further revisions and confirmation of amounts sought in the invoices from the Receiver and all of her professionals (1.2).	1.20	0.00	KDM
[Case administration] Emails to and from counsel for FDIC-R regarding final, filed version of the Motion for extension of time for FDIC-R to file response to Amended	0.30	79.50	KDM

Complaint and review that filed version and the accompanying proposed Order (.3).

	[Asset analysis and recovery] Correspondence with Venezuelan counsel.	0.10	26.50	MDV
	[Asset analysis and recovery] Revise answer and defenses to Protective Life Insurance's Complaint in Intervention.	0.50	75.00	AF
	[Asset analysis and recovery] Revise motion to approve settlement agreement with the Williams and coordinate filing.	0.40	60.00	AF
	[Fee and Employment Application] (No charge) Work on fee application.	1.50	0.00	DMC
May-29-14	[Asset analysis and recovery] Telephone call with insurance counsel regarding revised demand on 2008 policy (.4); meet with counsel regarding status and strategy regarding motions to dismiss (1.0); review and revise response to motion to dismiss by MCBI (1.5).	2.90	768.50	MME
	[Case administration] (No charge) Reviewing fee application.	0.70	0.00	MME
	[Asset analysis and recovery] Review and revise memorandum in opposition to motion to dismiss filed by individual defendants in MCBI action.	1.70	450.50	PFV
	[Asset analysis and recovery] Conference with team regarding proposed changes to response to motion to dismiss in MCBI action and supporting authority regarding fraud claims.	0.90	238.50	PFV
	[Asset analysis and recovery] Emails with counsel for FDIC and telephone conference regarding contacting the Court (0.2); review order of the court entering administrative closure order (0.1).	0.30	79.50	GFG
	[Asset analysis and recovery] Revise response to company motion to dismiss (3.5); revise response to the individual's motion to dismiss	9.20	2,438.00	GFG

(1.9); conference with the Receiver, and counsel regarding comments to draft of response to individual defendants' motion to dismiss (0.5); research motion to dismiss standard (0.7); revise response to motion to dismiss of individuals and company (2.6).

<p>[Asset analysis and recovery] Multiple emails with counsel for FDIC-R regarding the status of the Court's ruling on our Joint Motion for Administrative Closure and contacting the Court to request a status conference (.3); review Order administratively closing the case and confer with team members regarding language included in the Order (.3); emails to and from counsel for the SEC regarding the two settlements that we finalized with two fraudulent transferees and the releases incorporated into those agreements (.2); emails with Receiver and team members and strategize regarding retention of expert for the Receiver's claim against Nelson Mullins (.2); teleconference with Receiver and team members, including special insurance counsel regarding strategy and preparation of demand letter to Travelers pursuant to 2010 D&O policy, the Answers, Defenses and Affirmative Defenses to the life insurance companies' Complaints in intervention, response to the Declaratory Relief action filed by Travelers/St. Paul Mercury for the financial institution bond, and the Response to the Defendants' Motions to Dismiss the Third Amended Complaint in the MCBF action, and other matters involving insurance issues (1.2); emails to and from special insurance counsel regarding the Complaints in intervention filed by the life insurance companies for purposes of evaluating draft Answers, Defenses and Affirmative Defenses (.3); review Stay Provisions in Order Appointing Receiver and exchange emails with special insurance counsel regarding strategy for call to counsel for Travelers/St. Paul Mercury regarding violation of that provision (.3); review emails with special insurance counsel regarding expiration of D&O policy and the claim letter we sent to insurance carrier prior to such</p>	<p>3.10</p>	<p>821.50</p>	<p>KDM</p>
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expiration and prepare and send email to Receiver with explanation (.3).

[Asset analysis and recovery] (MCBI Action) Meet with Receiver and team members regarding strategy for and structure of the Responses to the Defendants' Motions to Dismiss the Third Amended Complaint and further revisions to be made to those Responses (1.1); review portions of latest revised Response to Individual Defendants and strategize with team members (.8); begin reviewing Response to MCBI's Motion to Dismiss Third Amended Complaint, discuss with Receiver, and assist with making Receiver's revisions (.5).	2.40	636.00	KDM
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[Case administration] (No charge) Make final revisions and additions to Fee Application, provide to Receiver for review and approval, confer with Receiver regarding further revisions to invoices, and assist with revisions to invoices (.9); meet with Receiver regarding finalizing and sending Fee Application and all invoices to counsel for SEC for consideration and prepare and send email to counsel for SEC regarding status of preparation of Fee Application (.2).	1.10	0.00	KDM
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[Asset analysis and recovery] (MCBI Action) Research regarding arguing trustworthiness of document at motion to dismiss phase.	1.70	255.00	AF
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[Asset analysis and recovery] (MCBI Action) Research regarding determination of reasonable reliance at motion to dismiss phase.	2.00	300.00	AF
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May-30-14	[Asset analysis and recovery] Review various inserts and cases for draft responses to motion to dismiss and conferences with counsel regarding's same (.8); review Price's recent correspondence and statements (.6).	1.40	371.00	MME
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[Asset analysis and recovery] Revise response to individuals' motion to dismiss pursuant to comments of the Receiver and counsel (1.8); further research regarding loan reserve cases (2.1); further research regarding duty (1.4);	10.40	2,756.00	GFG
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draft new statement of facts and summary of argument (2.6); draft table summarizing all of the new facts in Third Amended Complaint (2.5).

[Asset analysis and recovery] Emails with special insurance counsel regarding call with counsel for St. Paul/Travelers in declaratory relief action on the financial institution bond and reschedule call (.2); emails to and from counsel for sole director of MCBI regarding scheduling a call to discuss various matters and confer with Receiver (.2); finish reviewing draft Response to MCBI's Motion to Dismiss Third Amended Complaint and strategize regarding revisions (.7); begin reviewing second draft of Response to Individual Defendants' Motion to Dismiss Third Amended Complaint and strategize with team members regarding further revisions being made to the Response (.8).	1.90	503.50	KDM
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[Case administration] Review and revise Application for special insurance counsel to appear Pro Hac Vice in main enforcement action for purposes of Intervention Complaints filed by life insurance companies and send draft of Application to insurance counsel to fill in certain information (.2).	0.20	53.00	KDM
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[Case administration] (No charge) Work on finalizing invoices of counsel for the Receiver for purposes of Fee Application and confer with Receiver regarding invoices, obtaining SEC approval, and filing Application (.3); emails to and from counsel for SEC regarding its consideration of Fee Application and revision to Certification of Conference therein (.2); review final version of Application and all Exhibits, coordinate preparation of proposed Order and review and approve that Order, and coordinate filing of Application with all Exhibits and proposed Order (.4).	0.90	0.00	KDM
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[Asset analysis and recovery] (MCBI Action) Research regarding court not being able to address argument made for first time in reply memorandum instead of motion to dismiss.	2.00	300.00	AF
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	[Fee and Employment Application] (No charge) Revise and finalize fee application; gather, scan and label exhibits to same for submission to SEC for approval.	1.90	0.00	DMC
	[Asset analysis and recovery] (No charge) Assist attorney K. Murena in finalizing the Seventh Interim Fee Application, finalize all exhibits for the Seventh Fee Application and prepare proposed order regarding same.	2.10	0.00	pl
May-31-14	[Asset analysis and recovery] Review correspondence and changes regarding response to Motion to Dismiss.	0.50	132.50	PFV
	[Asset analysis and recovery] Revise response to company motion to dismiss (1.3); revise summary of new statements and draft response to arguments regarding bespeaks caution and safe harbor based on new research (1.6); revise summary of facts and summary of argument (2.1); review comments of counsel, Ken Murena, to Company response (, revise company response pursuant to comments of the Receiver and counsel and further research regarding same (2.3).	7.30	1,934.50	GFG
	[Asset analysis and recovery] Continue reviewing and revising Response to MCBF's Motion to Dismiss Third Amended Complaint (3.4); telephone calls with team members regarding further revisions to that Response and revisions being made to the Response to the Individual Defendants' Motion to Dismiss Third Amended Complaint (.3); review and revise Summary of Facts section of Response and confer with team members regarding structure of Response (.8); review table of allegations added to Third Amended Complaint, highlighting differences from Amended Complaint and strategize with team members regarding revisions to and inclusion of that table in Response (.4).	4.90	1,298.50	KDM
Jun-01-14	[Asset analysis and recovery] (MCBI Action) Work on response to Motion to dismiss filed by individual Defendants.	3.20	848.00	PFV

	[Asset analysis and recovery] (MCBI Action) Research and revise response to Company's motion to dismiss.	2.50	662.50	GFG
Jun-02-14	[Asset analysis and recovery] Meet with counsel regarding status and strategy regarding motions to dismiss (.4); review and revise response to motions to dismiss by MCBI and individual defendants (1.5).	1.90	503.50	MME
	[Asset analysis and recovery] Follow up review and revisions regarding response to individual defendants' Motion to Dismiss.	0.60	159.00	PFV
	[Asset analysis and recovery] Conference with Guy Giberson and Melanie Damian regarding same.	0.30	79.50	PFV
	[Asset analysis and recovery] Conferences with counsel regarding revisions to the Response to the individual defendants' Motion to Dismiss, revise response pursuant to comments of counsel and the Receiver (1.9); research and revise response to company's motion to dismiss (.6); revise internal cross references and citations to exhibits and revise other citations in responses, review table of contents and table of authorities, revise formatting of internal table, telephone conferences and emails with opposing counsel regarding motion to exceed the page limit, draft motion to exceed the page limit and proposed order (3.4); proof and revise final drafts of motion to exceed page limit, response memoranda and exhibits and file (3.3).	9.20	2,438.00	GFG
	[Asset analysis and recovery] Emails with special insurance counsel regarding teleconference with counsel for Travelers/St. Paul Mercury regarding the Declaratory Relief Complaint and its violation of the stay provision in the Order Appointing Receiver and deadline for us to respond to that Complaint (.2); emails with special insurance counsel regarding revisions to Answer to Complaint of Protective Life (.2); review Order granting Motion to Approve Settlement with potential fraudulent transferees, send	3.60	954.00	KDM

copy of Order to counsel for those transferees for purposes of facilitating the settlement payment, and exchange email with counsel regarding timing of settlement payment (.3); emails to and from counsel for sole director of MCBI regarding the status of all pending litigation and schedule a call to further discuss those matters (.2); review letter from counsel for another potential fraudulent transferee regarding his client's execution of Settlement Agreement, review signed Agreement and request better copy of the Agreement (.2); assist team members with final revisions to the Response to MCBI's Motion to Dismiss Third Amended Complaint (1.2); discuss with Receiver and team members seeking leave to expand the page limitation for Response briefs and obtaining agreement of both opposing counsel (.1); work with team members on final revisions to Response to Individual Defendants' Motion to Dismiss Third Amended Complaint (.7); strategize with team members regarding arguments to be raised in Motion to dismiss declaratory relief Complaint filed by Travelers/St. Paul Mercury and review legal authority supporting those arguments (.5).

[Case administration] Review final version of Motion for special insurance counsel to appear pro hac vice in main receivership action for purposes of complaints in intervention filed by life insurance companies and email to local requesting the filing thereof (.2).	0.20	53.00	KDM
[Asset analysis and recovery] (MCBI Action) Draft Motion to Exceed the Page Limits (0.6); Revise motion to exceed the page limits (0.4).	1.00	150.00	AF
[Asset analysis and recovery] Prepare Table of Citations and Table of Authorities for Plaintiff's Memorandum of Law in Opposition to Montgomery County Bankshares, Inc.'s Motion to Dismiss the Third Amended Complaint (1.9) Prepare Table of Citations and Table of Authorities for Plaintiff's Memorandum of Law in Opposition to	4.20	315.00	pl

Individual Defendants' Motion to Dismiss the
Third Amended Complaint (2.3)

	[Asset analysis and recovery] Review attorney's corrections and make edits to the Plaintiff's Memorandum of Law in Opposition to Montgomery County Bankshares, Inc.'s Motion to Dismiss the Third Amended Complaint for final review.	1.50	112.50	pl
	[Asset analysis and recovery] Review attorney's corrections and make edits to the Plaintiff's Memorandum of Law in Opposition to Individual Defendants' Motion to Dismiss the Third Amended Complaint for final review.	1.50	112.50	pl
Jun-03-14	[Asset analysis and recovery] Review and revise responses to life insurance complaints and meeting with counsel regarding same.	1.50	397.50	MME
	[Asset analysis and recovery] (Life Insurance claims) Multiple emails and telephone calls with special insurance counsel regarding the preparation of the Answers, Defenses and Affirmative Defenses to the Complaints in Intervention filed by intervening life insurance companies Protective Life, Household Life and Genworth Life (.9); work on preparing and revising Answers, Defenses and Affirmative Defenses to Complaints of Protective Life and Genworth and strategize with the Receiver regarding various revisions, additions and deletions thereto (3.8); telephone calls with special insurance counsel regarding Jury Demand, certain Affirmative Defenses, and law applicable to each of the life insurance policies (.4); confer with Receiver and team members regarding those issues and revise Answers accordingly (.5).	5.60	1,484.00	KDM
	[Asset analysis and recovery] Email from counsel for J. Manguart regarding his client's re-execution of the Settlement Agreement (.1); email from forensic accountant regarding findings from investigation of transfer from S. Gaterud to Defendants and confirmation that funds were deposited into Union Bank account, review Union Bank statement	0.50	132.50	KDM

evidencing deposit and confirm updating of master reconstruction to re-categorize S. Gaterud as an investor (.4).

<p>[Asset analysis and recovery] (Travelers Dec Action) Review case law regarding dismissal of action against a receiver filed prior to obtaining stay relief and strategize with team members regarding moving to strike Complaint for Declaratory Relief filed by Travelers/St. Paul Mercury and/or seeking relief from receivership court (.5); emails with counsel for Travelers/St. Paul Mercury regarding the stay provision in the Order Appointing Receiver, the violation of that provision by filing the Declaratory Relief action before obtaining stay relief, and the extension of time to respond to Complaint while stay issue is resolved (.3); send Order Appointing Receiver to counsel or Travelers/St. Paul Mercury, explaining the stay provision and confirming conference call with special insurance counsel to discuss these issues (.2); strategize with special insurance counsel regarding these issues, applicable case law and the stay provision, and preparing for upcoming call with opposing counsel (.3).</p>	1.30	344.50	KDM
<p>[Asset analysis and recovery] Emails with S. Banez regarding shipment of keys to storage in Irvine, CA and computer seized from Irvine office, contents of the computer and status of the storage (.2); emails with team members regarding inventories prepared for the contents of the storage facilities, review inventory of Las Vegas storage, discuss status of two computers shipped to CFTC for imaging, and forward inventory to prospective auctioneer for purposes of providing proposal for auction (.5).</p>	0.70	185.50	KDM
<p>[Asset analysis and recovery] Review and revise answer and defenses to Protective Life's complaint in intervention and Genworth's complaint in intervention.</p>	3.00	450.00	AF
<p>[Asset analysis and recovery] Assist attorney K. Murena and A. Fernandez in finalizing</p>	0.70	52.50	pl

Answers to the Insurance Company Intervenor Complaints.

Jun-04-14	[Asset analysis and recovery] E-mail correspondence with Venezuelan counsel regarding status and strategy concerning various issues (.6); meet with counsel regarding status and strategy (.3).	0.90	238.50	MME
	[Case administration] Return calls from investors regarding status.	0.40	106.00	MME
	[Asset analysis and recovery] (Travelers Dec Action) Email from counsel for Travelers/St. Paul Mercury regarding upcoming call to resolve issues arising from filing of complaint without first seeking stay relief, strategize with team members regarding preparation of motion to strike or motion for extension of time to respond to complaint, and coordinate preparation of unopposed motion for extension of time to respond to complaint (.3); emails to and from counsel for Travelers/St. Paul Mercury regarding filing of motion for extension of time to respond to complaint and length of extension to be requested (.2); review and revise unopposed motion for extension of time, emails to and from counsel for Travelers/St. Paul Mercury regarding approval of form of motion, and notify our local counsel of intention to file motion (.3); discuss proposed extension of time with the Receiver for purposes of resolving procedural issue and obtain approval to file motion for extension (.1).	0.90	238.50	KDM
	[Asset analysis and recovery] (Life Insurance claims) Review, revise and finalize Answer, Defenses and Affirmative Defenses to Complaint in Intervention filed by Household Life and coordinate filing of same (.9).	0.90	238.50	KDM
	[Asset analysis and recovery] Meet with Receiver regarding setting up account in Venezuela to preserve the funds received for the harvests and discuss authority and risks associated therewith (.2); review emails with	0.30	79.50	KDM

Venezuela counsel regarding the foregoing matters (.1).

[Asset analysis and recovery] Correspondence with Venezuela counsel regarding value of farms (.2); update Receiver (.1).	0.30	79.50	MDV
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[Asset analysis and recovery] Draft Answer and Defenses to Household's Complaint in Intervention.	1.40	210.00	AF
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Jun-05-14	[Asset disposition] Emails with realtor for the marketing and sale of the Price residence in Georgia regarding the immediate repairs, cleanup and landscaping work necessary to properly market and show the house to potential purchasers and review 2 estimates for repairs, cleanup and landscaping work (.2); confer with Receiver regarding the repairs and approval of the estimates and coordinate with realtor to have repairs, cleanup and landscaping performed (.2).	0.40	106.00	KDM
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[Asset analysis and recovery] (Travelers Dec Action) Emails with local counsel regarding finalizing and filing the Unopposed Motion for extension of time to respond to complaint and the proposed Order, review and approve form of the proposed Order, and coordinate submitting to the Court (.2).	0.20	53.00	KDM
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[Asset analysis and recovery] Receive report of A. Price's guilty plea in criminal action in S.D. Ga. and strategize with team members regarding effect on our efforts to recover assets (.3); continue working on following up on demand letters sent to potential fraudulent transferees and investors with net gains (.7); review tracking charts and coordinate updating them to reflect information obtained from investors and forensic accountant's confirmation of receipt of transfers tracking charts (.3).	1.30	344.50	KDM
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[Asset analysis and recovery] (Life Insurance actions) Review notices of interrogatories to be propounded by the three life insurance	0.20	53.00	KDM
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companies and follow up with counsel for each regarding that discovery (.2).

	[Case administration] Review Objection to Receiver's Seventh Fee Application filed by the three life insurance companies and strategize with Receiver and team members regarding response brief and discovery the insurance companies intend to propound and seek expedited responses to (.4).	0.40	106.00	KDM
Jun-06-14	[Asset disposition] Investigate whether there is a second lien on the Longboat Key property based on information provided by counsel for FDIC-R (.3); work on the minimum sale price for the Longboat Key property based on new minimum amount that FDIC-R is demanding for Partial Settlement Agreement of all real property issues (.2).	0.50	132.50	KDM
	[Asset analysis and recovery] Telephone call from A. Price regarding his plea agreement, his counsel's consent to all communications with him regarding all subjects, and various documents related to the Receiver's claims against third parties (.4); discuss with the Receiver and team members various issues addressed during call (.2); follow up on gathering of bank statements and investors list to provide to A. Price (.1).	0.70	185.50	KDM
	[Asset analysis and recovery] (Travelers Dec Action) Telephone call with counsel for Travelers/St. Paul Mercury and special insurance counsel regarding the stay provision in the Order Appointing Receiver and the proposal to abate the declaratory relief action so Travelers can obtain stay relief from the Receivership Court (.3); confer with Receiver regarding Travelers' proposal to abate the declaratory relief action and send email to Travelers' counsel and insurance counsel regarding agreement to abatement and preparation of Joint Motion to abate that proceeding (.2) .	0.50	132.50	KDM
	[Case administration] Emails to and from investor regarding forensic accountant's	0.90	238.50	KDM

confirmation based on analysis of bank statements and the check she provided that she is a net loser, and whether she will be included on the investors list, and follow up on updating of investors list (.2); multiple emails to and from counsel for FDIC-R regarding issues related to the proposed Partial Settlement Agreement involving the real property and schedule call to address those issues (.2); telephone call from counsel for FDIC-R regarding revision to proposed Partial Settlement Agreement, clarification of certain terms, and investigation of whether there are any second lienholders on the Longboat Key Property (.3); prepare and send email to Receiver and team members regarding call with counsel for FDIC-R and effect of proposed revised terms on recovery to the Estate (.2).

Jun-09-14	[Asset disposition] Prepare and send email to Receiver explaining the minimum sale price for the Longboat Key property based on new minimum amount that FDIC-R is demanding for Partial Settlement Agreement of all real property issues and discuss this with the Receiver and team members (.3); review email from and make telephone call to counsel for potential purchaser of the Kingsland Shopping center, refer him to counsel for the FDIC-R, and report status to Receiver (.3).	0.60	159.00	KDM
	[Asset analysis and recovery] Strategize with team members regarding bases for claims against SCAN International and its principals and the damages related to PFG's real property and coordinate adding claim and factual support to Complaint against SCAN (.5); strategize with team members regarding FDIC-R's request to share all communications with insurance companies for purposes of pursuing claims against D&O policies and the financial institutional bond (.4); strategize regarding possible defenses to the FDIC-R's foreclosure of the Longboat Key property in the event a settlement of all real estate issues is not reached with the FDIC-R and coordinate research regarding certain defenses (.6).	1.50	397.50	KDM

	[Asset analysis and recovery] (Life Insurance actions) Review Protective Life's and Household Life's respective First Set of Interrogatories and Notices of Deposition of Receiver, coordinate calendaring deadlines to respond and proposed deposition date, and coordinate preparation of responses to interrogatories (.5).	0.50	132.50	KDM
	[Case administration] Continue working on updating investors list based on revised forensic analyses and documents received from net winners and potential fraudulent transferees (.4); strategize with team members regarding new terms proposed by FDIC-R for Partial Settlement Agreement regarding all real estate issues and discuss possible counteroffer (.6).	1.00	265.00	KDM
	[Asset analysis and recovery] Gather and organize all Bank of America documents related to PFG LLC, PFG entities and Scan International for purposes of investigation of various transfers to third parties from which the Receiver may seek recovery.	3.00	225.00	pl
Jun-10-14	[Case administration] Review and revise FDIC settlement proposal agreement, and meet with counsel to discuss comments and questions regarding that argument.	1.00	265.00	MME
	[Asset analysis and recovery] Meet with Receiver and discuss with team members status of negotiations with Nelson Mullins and affidavit of expert in support of the Estate's claim against the firm (.2); strategize with Receiver and follow up with team members on obtaining FDIC-R's participation in demand letter to insurance company and discuss FDIC-R's proposed revisions to that demand letter and its rationale and interpretation of the insurance policy (.3); review summary of research findings regarding defenses to foreclosure action and review applicable case law (.5); confer with Receiver regarding preparation of complaint against former financial advisors of Montgomery Asset Management and issues related to the	1.30	344.50	KDM

Evanston Insurance policy and follow up on preparation of that complaint (.3).

[Asset analysis and recovery] (Life Insurance Companies' claims) Review Genworth's First Set of Interrogatories and First Request for Production of Documents and coordinate preparation of responses thereto and calendaring of deadlines to serve those responses (.4); review Genworth's Notice of Deposition of the Receiver and coordinate calendaring (.1); strategize with team members regarding discovery requests for the Receiver to propound to the insurance companies (.2).	0.70	185.50	KDM
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[Case administration] Meet with Receiver to discuss the status and strategy for all pending actions and claims, the work being done and to be done, and to assign various projects different team members (.3); email from counsel for FDIC-R regarding initial draft of global Settlement Agreement and discuss with Receiver her comments to that draft and various provisions that need to be revised and/or clarified (.6).	0.90	238.50	KDM
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[Asset analysis and recovery] Correspondence with Venezuela counsel (.1).	0.10	26.50	MDV
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[Asset analysis and recovery] Research regarding unclean hands defense in foreclosure action.	0.80	120.00	AF
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Jun-11-14	[Asset analysis and recovery] Review and make proposed changes to draft settlement agreement with FDIC-R.	0.60	159.00	PFV
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[Asset analysis and recovery] Prepare for and attend telephone conference with Douglas Chandler regarding affidavit, documents and strategy (0.9); prepare file with Nelson Mullins exhibits for electronic review online (0.5); review file regarding additional Nelson Mullins related documents (1.1).	2.50	662.50	GFG
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[Asset analysis and recovery] Review	0.90	238.50	GFG
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agreement proposed by the FDIC and review file regarding ramifications of agreement.

	[Asset analysis and recovery] Strategize with team members regarding factual basis for claims against managers of Montgomery Asset Management and applicable Evanston Insurance policy for purposes of preparation of complaint against those managers (.5); continue strategizing with team members on formulating defenses to potential foreclosure action by the FDIC-R for the Longboat Key property in light of research findings (.3); strategize regarding claim against auditor of MB&T and possibly entering into tolling agreement (.2); emails to and from counsel for the Williams regarding receipt and clearance of settlement check and confirm clearance (.2).	1.20	318.00	KDM
	[Asset analysis and recovery] (Life Insurers actions) Confer with Receiver regarding Notices of Deposition of life insurance companies, confirm Receiver's availability on scheduled date, and coordinate confirmation and offer to counsel for insurers for us to host deposition (.2).	0.20	53.00	KDM
	[Case administration] Review and revise initial draft of Global Agreement proposed by FDIC-R and strategize with Receiver and team members regarding various provisions and revisions to propose to FDIC-R (1.7); send initial draft of Global Agreement to special insurance counsel, request input on certain provisions and their effect on our claims against certain insurance policies, and exchange emails with special insurance counsel (.3).	2.00	530.00	KDM
	[Asset analysis and recovery] (SCAN) Research regarding statute of limitations for fraudulent transfer and unjust enrichment claims.	0.30	45.00	AF
Jun-12-14	[Case administration] Meet with counsel regarding draft of FDIC proposed settlement.	1.00	265.00	MME

	[Asset analysis and recovery] Attend team conference regarding proposed changes to FDIC-R proposed Settlement Agreement.	1.00	265.00	PFV
	[Asset analysis and recovery] Emails from realtor regarding latest offer for purchase of Longboat Key property and review cash offer and letter of intent (.3); discuss latest offer with Receiver and strategize regarding making counteroffer (.2); telephone call with realtor regarding the offer and letter of intent, the status of the Receivership and the real estate settlement with the FDIC-R and whether Court approval would be required for this offer, and the Receiver's counteroffer (.3).	0.80	212.00	KDM
	[Case administration] Meet with Receiver and team members to discuss and strategize regarding necessary revisions to Global Agreement proposed by the FDIC-R (1.0); emails with special insurance counsel regarding Global Agreement and schedule a call to discuss necessary revisions (.2).	1.20	318.00	KDM
Jun-13-14	[Asset analysis and recovery] Review e-mails from counsel and telephone call with counsel regarding Venezuelan farms (.5); review the corn harvest estimates (.3).	0.80	212.00	MME
	[Case administration] Meet with counsel regarding FDIC proposal and insurance issues.	0.70	185.50	MME
	[Asset analysis and recovery] Conferences with counsel and Receiver regarding response to proposed agreement with FDIC.	0.70	185.50	GFG
	[Case administration] Review record and objections to fee application, research and draft response to objections to fee application (4.1).	4.10	1,086.50	GFG
	[Asset disposition] Email from realtor regarding initial response from potential purchaser of Longboat Key property to our counteroffer and issues related to zoning and discuss with Receiver (.2); email from realtor regarding another letter of intent and increased offer from another potential purchaser of the	0.90	238.50	KDM

Longboat Key property and need for signed contract and proof of funds, review Letter of Intent and email from that potential purchaser's realtor, and discuss with Receiver (.3); telephone call to our realtor to discuss both potential purchasers' offers, our responses and counter offers, the one potential purchaser's response to our counteroffer, and requesting a signed contract and proof of funds from the other potential purchaser, and discuss and strategize with Receiver (.4).

<p>[Asset analysis and recovery] Follow up with and receive email from counsel for one of the investors who received a net gain regarding her execution of the Settlement Agreement and expected delivery date (.2); gather and send to special insurance counsel all discovery requests and notices of deposition sent by the life insurance companies and address the scheduling of the deposition of the Receiver (.2); email from counsel for FDIC-R regarding the FDIC-R's joining in our proposed demand letter to Travelers under the 2010 D&O policy and confer with Receiver and team members (.3); strategize with team members regarding revisions to demand letter to Travelers under the 2010 D&O policy based on recommendations of special insurance counsel and following up with FDIC-R regarding their joining in the demand letter (.4).</p>	1.10	291.50	KDM
<p>[Case administration] Emails with special insurance counsel regarding Global Agreement proposed by FDIC-R and rescheduling call to discuss special insurance counsel's comments and recommendations (.2); teleconference with special insurance counsel and other team members regarding the FDIC-R proposed Global Agreement and certain provisions therein, the demand letter to Travelers under the 2010 D&O policy and the status of the FDIC-R's joining in that demand, the status of the pro hac vice application for intervention actions filed by the life insurance companies and the discovery requests they propounded, the status of negotiations with counsel for St. Paul Mercury/Travelers in the declaratory relief action under the financial institution</p>	0.80	212.00	KDM

bond and the forensics required for those negotiations, and the status of our negotiations with counsel for Evanston and our claim and the FDIC-R's claims covered by that policy (.7).

	[Asset analysis and recovery] Phone conference with Receiver and Venezuela counsel regarding status (.3); review documents regarding farms (.1).	0.40	106.00	MDV
Jun-16-14	[Asset disposition] Email from realtor for Longboat Key property regarding contract to purchase that property, signed by purchaser, review that contract, discuss with Receiver, and send to real estate counsel for review (.5); email from real estate counsel regarding his review of the contract and obtaining the payoff letter from counsel for the FDIC-R (.2); emails to and from realtor regarding real estate counsel's review of the contract and Court's order pre-approving sale for amount in excess of amount owed to FDIC-R plus closing costs (.2).	0.90	238.50	KDM
	[Asset analysis and recovery] Email from criminal counsel for Price regarding plea agreement with the U.S. Attorneys' offices for the S.D. Ga. and E.D.N.Y., his consent to our communicating with Price on all matters, and whether certain other parties' interests are aligned with the Receivers, and strategize with team members regarding communications with Price (.5).	0.50	132.50	KDM
	[Case administration] Discuss with Receiver and team members effect of sale of Longboat Key property on real estate agreement with the FDIC-R (.3); emails to and from counsel for FDIC-R regarding Receiver's approval of revised terms of real estate agreement with the FDIC-R and request for final version of that agreement so the Receiver can execute it (.2); revise Global Agreement with FDIC-R to incorporate revisions and comments of Receiver and all team members (1.8); strategize with team members regarding revisions to propose and issues to discuss with	2.90	768.50	KDM

counsel for FDIC-R related to Global Agreement (.6).

Jun-17-14	[Asset analysis and recovery] Review and execute contract for sale of Long Boat Key (0.4); meet with counsel regarding status of negotiations with FDIC-R (0.1).	0.50	132.50	MME
	[Case administration] Research and revise response to life insurance company's objection to fee application (Constitutional standing argument).	3.70	980.50	GFG
	[Asset disposition] Multiple emails with realtor for Longboat Key property regarding status of Receiver's consideration of the latest contract to purchase the property, the real estate counsel's feedback on that contract and revisions to be made, the Receiver's acceptance of the offer and execution of the contract, and providing notification to purchaser's realtor and attorney (.4); exchange several emails with real estate counsel regarding the contract to purchase Longboat Key property, revisions to be made thereto, certain title defects to the property, and the escrow arrangement and provisions, and discuss with Receiver (.4); review real estate counsel's proposed revisions to the contract and exchange emails regarding certain provisions to further revise (.3); review contract with Receiver, discuss certain minor revisions thereto, and have Receiver execute and initial the contract and the interlinear revisions (.2); send executed contract to realtor to hold pending final approval by real estate counsel (.1); review another draft of the contract revised by the real estate counsel to address provisions required pursuant to the Court's Order approving the sale of the property, review that Order, and exchange emails with real estate counsel regarding that Order and further revisions needed to the contract to comply with that Order (.3).	1.70	450.50	KDM
	[Asset analysis and recovery] Telephone call from A.L. Price to discuss the latest summary report of transfers to and from investors and	0.90	238.50	KDM

further investigation to be done to confirm certain information and revise as necessary, and review certain bank statements underlying the summary report (.5); meet with Receiver regarding discovery propounded by life insurance companies, preparation of our discovery requests to life insurance companies, proposing mediation to counsel for life insurance companies, and obtaining input from special insurance counsel regarding discovery requests to propound to life insurance companies (.2); send email to special insurance counsel regarding discovery requests and possibly mediating the life insurance companies' claims (.2).

[Case administration] Meet with Receiver regarding status of negotiations with counsel for FDIC-R regarding Global Agreement and follow up on those negotiations with team members (.2); follow up with counsel for FDIC-R regarding status of preparation of final draft of real estate agreement to be executed (.1).	0.30	79.50	KDM
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[Asset analysis and recovery] Prepare skeleton draft of responses to the Life Insurance Companies' First Sets of Interrogatories, Requests for Production and Requests for Admission for attorney A. Fernandez to complete.	2.20	165.00	pl
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Jun-18-14	[Asset analysis and recovery] Review markup of agreement with FDIC and revise.	0.40	106.00	GFG
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[Asset analysis and recovery] Research and draft response to motion to intervene (0.2); research issues related to coverage generally and research issues related to declaratory judgment (0.6); draft email to counsel, Ken Murena, with research findings and proposing strategy (0.8).	1.60	424.00	GFG
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[Asset analysis and recovery] Telephone conference with counsel for the FDIC, Alan Curley, regarding insurance and claims issues (.8); review forensics file regarding claims and insurance issues (.3); conferences with	2.50	662.50	GFG
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counsel, Ken Murena, regarding forensics and file review, draft email to insurance counsel regarding claims against bond and strategy (1.4).

[Asset disposition] Review revised Contract for sale of Longboat Key property with Receiver's signature and initials by all the changes and send to real estate counsel and realtor requesting confirmation that the contract may be submitted to the buyer's broker and attorney for the buyer's review and initials by the changes (.2); exchange emails with real estate counsel and realtor regarding the submission of the contract to the buyer's broker (.1).	0.30	79.50	KDM
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[Asset analysis and recovery] Emails with special insurance counsel regarding discovery requests to propound to the life insurance companies, strategy for mediation and discovery and information and evidence needed to defend against their claims, and schedule meeting to further discuss these issues (.2); exchange further emails with special insurance counsel regarding actions filed by life insurance companies (.2); strategize with team members regarding information obtained from FDIC-R related to financial institutional bond and need for investigation into transfers from PFG and PFGBI to MB&T (.2); review forensic reports regarding transfers from Receivership Entities to MCBI and MB&T and strategize regarding basis for claim against the bond (.8); review letter from C. Roland enclosing certain records purporting to support his and his mother's claim to having invested funds with A. Price, review those records and forward to forensic accountant for further analysis and, if appropriate, incorporation into master reconstruction and re-categorization of those investors, and request to updated investor and potential fraudulent transferee reports (.9); receive report from G. Giberson regarding his latest call with counsel for the FDIC-R regarding the demand letter to Travelers under the 2010 D&O policy and discuss revisions to be made to that letter (.2).	2.50	662.50	KDM
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	[Asset analysis and recovery] (MCBI Action) Review Motion for extension of time for MCBI to file Reply to our Response to Motion to Dismiss Third Amended Complaint (.1).	0.10	26.50	KDM
	[Case administration] Gather and provide to team members information regarding the amount of funds in the Estate and future anticipated recoveries (.2); email from investor inquiring about the status of the claims and distribution process and coordinate sending response letter and provide information to include in that letter (.2).	0.40	106.00	KDM
	[Asset analysis and recovery] Gather documents produced by Suntrust Bank and Wells Fargo Bank for purposes of analysis of claims against fraudulent transferees.	1.50	112.50	pl
Jun-19-14	[Asset analysis and recovery] Review Venezuelan issues and responding to e-mails.	0.40	106.00	MME
	[Asset analysis and recovery] Telephone conference with counsel for Life Insurer regarding discovery and fee issue (.2).	0.20	53.00	GFG
	[Case administration] Conferences with counsel, Ken Murena, regarding response to fee application objections, and revise response to objections (3.8).	3.80	1,007.00	GFG
	[Asset analysis and recovery] (MCBI Action) Review Order granting motion for extension of time for MCBI to file reply to Receiver's Response to Motion to Dismiss Third Amended Complaint and coordinate calendaring of new deadline (.1); review individual defendants' Reply to Receiver's Response to Motion to Dismiss Third Amended Complaint (.3).	0.40	106.00	KDM
	[Asset analysis and recovery] Emails and telephone calls to and from special insurance counsel regarding deadlines, scheduling conferences, and strategy in intervention actions by life insurance counsel, and schedule meeting with team members (.3); review	0.50	132.50	KDM

analysis regarding financial institutional bond and basis for the Receiver's claim against the bond and confirm meeting with special insurance counsel to discuss issues related to the bond (.2).

[Case administration] Telephone call from counsel for SEC regarding the life insurance companies intervention claims against the Receiver, certain provisions of the Court's Order permitting them to intervene, and their objections to the Receiver's 6th and 7th Fee Applications and the SEC's possible response to the latest objection (.2); coordinate contacting counsel for insurance companies regarding extension of time to file response to their objection and review emails with counsel (.2); emails to and from counsel for SEC regarding consent to extension of time (.1); coordinate preparation of motion for extension, review motion and coordinate finalizing and filing with the Court (.2).	0.70	185.50	KDM
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[Asset analysis and recovery] Email to investor regarding distribution of funds.	0.20	30.00	AF
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[Case administration] Telephone calls to opposing counsel to obtain consent for an extension of time to reply to Insurance Companies' Objections to Receiver's Seventh Fee Application (.2); prepare Motion for Extension of Time for Receiver to Reply to Insurance Companies' Objections to the Receiver's Seventh Fee Application and proposed order regarding same for attorney review, finalize and file electronically.(.6)	0.80	60.00	pl
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Jun-20-14	[Asset analysis and recovery] Review waiver agreement with Osama Lwis (.4); e-mail with Venezuelan counsel (.3).	0.70	185.50	MME
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[Asset analysis and recovery] Review markup of agreement with FDIC prepared by counsel incorporating comments of the Receiver and revise.	0.70	185.50	GFG
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[Case administration] Emails with counsel and revise response to objection to fee application.	0.30	79.50	GFG
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	<p>[Asset analysis and recovery] Teleconference with special insurance counsel regarding strategy for discovery, 26(f) conference, and resolving intervention claims of life insurance companies, including preparation of stipulated facts and mediation (.3); teleconference with special insurance counsel regarding St. Paul Mercury/Travelers' declaratory relief action on the financial institution bond, the Receiver's defenses to that action, the bases for the Receiver's claim against the bond and the supporting forensics, the Order abating that action pending the filing and granting of a stay relief motion in Receivership action, and related matters (.7); review preliminary forensics analysis of transfers to MB&T, proof of loss forms for MCBF and PFGBI and explanation of basis for claims, and send to special insurance counsel for purposes of the Receiver's claim against the bond (.4); review analysis of forensic accountant of information and documents provided by the Rolands in support of their claimed investments in response to Receiver's demand letter for return of net gains (.2); emails to and from criminal counsel for A.L. Price regarding upcoming meeting with counsel for various investors and strategize with team members regarding criminal counsel's consent to meetings and our attendance at those meetings (.2); review emails with counsel for various investors to schedule meeting with A.L. Price (.1).</p>	1.90	503.50	KDM
	<p>[Case administration] Review Order granting motion for extension of time to respond to life insurance companies' objection to latest fee application and coordinate calendaring of new deadline (.1).</p>	0.10	26.50	KDM
Jun-23-14	<p>[Asset disposition] Multiple emails with realtor and real estate counsel regarding status of purchaser's execution of revised contract for sale of the Longboat Key property, the reasons for the delay in execution and possible issues with the party who signed the initial offer and letter of intent, and other possible</p>	0.30	79.50	KDM

offers to purchase the property, and coordinate contacting purchaser's broker and attorney (.3).

[Asset analysis and recovery] Receive report from special insurance counsel regarding the Rue 26(f) conference and all parties' agreement to new deadlines to serve initial disclosures and respond to life insurance companies' discovery requests and review email from counsel for life insurance companies seeking to reschedule the deposition of the Receiver, coordinate re-calendar of deadlines and cancellation of deposition, work on clearing dates for the deposition and exchange emails with team members regarding discovery deadlines and scheduling deposition (.5); review St. Paul Mercury's Motion to Intervene and for Leave to Proceed with Claims in Declaratory Judgment Action Against Receiver and coordinate calendaring of deadline to respond (.4); review letter from counsel for J. Manguart enclosing original executed Settlement Agreement and coordinate filing of Motion to approve Settlement Agreement (.1); review letter from G. Adams responding to the Receiver's demand for return of funds transferred from PFG and coordinate responding to his letter and obtaining documents in support of his claims (.2); coordinate obtaining from the Rolands further documents in support of their claim to having invested additional funds with Price (.2).	1.40	371.00	KDM
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[Case administration] Strategize regarding life insurance companies' standing to object to the Receiver's Fee Applications (.2); review and revise the Receiver's Response to life insurance companies' objection to Seventh Fee Application and coordinate making further revisions (1.2).	1.40	371.00	KDM
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Jun-24-14	[Asset analysis and recovery] Review and execute settlement agreement on clawback claim (.2); review and execute amendment on Long Boat Key sale documents (.2).	0.40	106.00	MME
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[Case administration] Review and revise response to Household Life's Objection to fee application.	1.00	265.00	MME
[Asset disposition] Emails with real estate counsel and realtor for Longboat Key property regarding Addendum to the Agreement for the sale of the property, review that Addendum, have Receiver review and execute it, and send executed copy to real estate counsel and realtor (.4); emails to and from realtor for Price residence regarding completion of all repairs and deferred maintenance items to the house, pictures of the property before and after the repairs and maintenance, periodic maintenance required, changing of the locks, and request to pay invoices for repairs and maintenance and to reimburse the realtor for changing the locks, review pictures, invoices and proof of payment, and coordinate payment of invoices and reimbursement to realtor (.5).	0.90	238.50	KDM
[Asset analysis and recovery] Review and make final revisions to Motion to approve Settlement Agreement with net winner J. Manguart, coordinate Receiver's final review and execution of Agreement, providing a summary of its terms to the Receiver, and coordinate filing of the Motion to approve (.3); confer with Receiver and team members regarding status of preparation of complaint against SCAN and its principals and obtaining information from A. Price regarding claims against those parties (.1); emails with special insurance counsel regarding preparation of response to St. Paul Mercury's Motion to Intervene and for stay relief to pursue declaratory relief action, confirm deadline to respond to Motion, and coordinate preparation of response (.2).	0.60	159.00	KDM
[Case administration] Review and make final revisions to Receiver's Response to the life insurance companies' objection to the Receiver's Seventh Fee Application, provide to Receiver for review, and discuss with Receiver (.5).	0.50	132.50	KDM

	[Asset analysis and recovery] Review fax from Gary Adams (0.1); Conference with K. Murena regarding obtaining documents from Carl and Neil Roland to demonstrate they are net losers (0.1); Review signed settlement agreement from Julie Manguart (0.1); Draft motion and proposed order to approve settlement agreement with Julie Manguart (0.4); Revise motion and proposed order to approve settlement agreement, create attachments, and coordinate filing (0.5).	1.20	180.00	AF
	[Asset analysis and recovery] Review letter sent by Carl Roland and email sent by Suruchi regarding further documentation necessary to give credit to Rolands for certain early claimed investments (0.2); Phone call to Carl Roland regarding further documentation required to provide claimed investments (0.1).	0.30	45.00	AF
	[Asset analysis and recovery] Draft letter to Gary Adams regarding sending documentation to prove real estate transactions underlie transfers to him.	0.50	75.00	AF
	[Case administration] Draft Executive Summary for Response to Life Insurance Companies Objections to the Receiver's Seventh Fee Application.	0.60	90.00	AF
Jun-25-14	[Asset analysis and recovery] Review Order granting Motion to approve settlement with J. Manguart, coordinate calendaring of deadline to make settlement payment, sending Order to counsel for J. Manguart, and report to Receiver (.2).	0.20	53.00	KDM
	[Case administration] Telephone calls and emails to and from special insurance counsel and team members regarding strategy for response to St. Paul Mercury's Motion to intervene and for stay relief to pursue declaratory relief action for purposes of the Receiver's and the FDIC-R's claims against the financial institutional bond for Montgomery Asset Management (.5).	0.50	132.50	KDM

Jun-27-14	[Asset disposition] Emails to and from realtor for the sale of the Longboat Key property regarding update on the execution of the sales contract and addenda and the wiring instructions for the escrow agent to hold the sale proceeds pending the completion of the agreement with the FDIC-R regarding the division of the proceeds (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] Multiple emails with special insurance counsel regarding response to St. Paul Mercury's Motion to Intervene and for Stay Relief, strategize with team members, and confirm that deadline to file response has been calculated properly and calendared for all team members (.5); review Order granting Motion to approve settlement with J. Manguart, coordinate calendaring of deadline for J. Manguart to make settlement payment, and coordinate sending Order to counsel for J. Manguart (.2).	0.70	185.50	KDM
Jun-28-14	[Asset analysis and recovery] Research issues related to declaratory action and email counsel, Ken Murena, regarding strategy and suggestions.	1.40	371.00	GFG
Jun-30-14	[Asset analysis and recovery] E-mails with counsel in Venezuela (.2); e-mail with counsel regarding SCAN International (.2); meeting with counsel regarding FDIC agreement (.4).	0.80	212.00	MME
	[Asset disposition] Email from real estate counsel regarding need for certified copy of the Order approving sale of Longboat Key property and follow up on obtaining certified copy (.1).	0.10	26.50	KDM
	[Asset analysis and recovery] Strategize with team members regarding responding to St. Paul Mercury's Motion to intervene and for stay relief in receivership action and the Complaint for declaratory relief on the financial institution bond (.3); emails with Receiver and team members regarding status of review of bank records and communications with A.L. Price regarding transfers to SCAN International and its principals and preparation	0.90	238.50	KDM

of Complaint against them (.2); emails to and from and telephone call to Jim Price regarding status of review of bank records for evidence in support of claims against third parties (.2); follow up on finalizing and sending letter to G. Adams regarding his response to our demand letter for return of funds received from Defendants and inquiring about real estate transaction his referenced in his response letter (.2).

[Asset analysis and recovery] (MCBI Action) Review MCBI's Reply in Support of Motion to Dismiss Third Amended Complaint (.2).	0.20	53.00	KDM
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[Case administration] Emails to and from counsel for FDIC-R regarding the revised agreements resolving all real estate issues and the loan documents that are to be assigned to the Receiver pursuant to that agreement, review revised agreements, and locate and send loan documents to be assigned to counsel for the FDIC-R (.5).	0.50	132.50	KDM
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[Asset analysis and recovery] Research and draft complaint against MCBI and its directors and officers and amended demand letter.	1.50	337.50	MCE
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Jul-01-14	[Asset analysis and recovery] Conference with counsel regarding revisions to FDIC proposed agreement and emails the FDIC's counsel and attach redline revisions to proposed agreement regarding claims.	1.20	318.00	GFG
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[Asset disposition] Multiple emails with real estate counsel and realtor regarding the status of the buyer's execution of the revised contract for the sale of the Longboat Key Property and the selection of the escrow agent to hold the sale proceeds (.4).	0.40	106.00	KDM
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[Asset analysis and recovery] Strategize with team members regarding responses to discovery requests propounded by life insurance companies and confirm that proper deadline is calendared for whole team in light of insurance companies' premature service of those discovery requests (.4).	0.40	106.00	KDM
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	[Asset analysis and recovery] Correspondence with Venezuela counsel (.2).	0.20	53.00	MDV
	[Asset analysis and recovery] Review background facts and continue to draft complaint against MCBI.	1.50	337.50	MCE
Jul-02-14	[Asset analysis and recovery] Telephone call with counsel and insurance counsel regarding St. Paul Mercury's motion to intervene regarding Bond and various life insurance issues (.6); reviewing and revising Joint Preliminary Report in life insurance cases (.4).	1.00	265.00	MME
	[Asset analysis and recovery] Emails with special insurance counsel regarding Joint Scheduling Report and Discovery Plan to be filed in actions against life insurance companies, review that Report and Plan and the Receiver's proposed revisions, and exchange emails regarding the filing of that Report and Plan (.4).	0.40	106.00	KDM
	[Asset analysis and recovery] (MCBI Action) Strategize with team members regarding arguments raised by individual defendants in their reply to our response to their Motion to Dismiss the Third Amended Complaint and possible basis for seeking leave to file surreply (.2).	0.20	53.00	KDM
	[Case administration] Emails from investors regarding Victim's Impact Statement to be provided to U.S. Attorneys' Office and review difference versions of that statement (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] Continue drafting complaint against MCBI.	1.00	225.00	MCE
Jul-03-14	[Asset disposition] Emails with special insurance counsel regarding certified copy of Order approving sale of Longboat Key property and confirm receipt thereof for purposes of scheduling the closing (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] Emails with special insurance counsel regarding Rule 26(f)	0.40	106.00	KDM

conference and rescheduling deposition of Receiver (.2); emails with team members regarding preparation and filing of Certificate of Interested parties and corporate disclosure statement, review Certificate and coordinate filing and service thereof (.2).

[Case administration] Emails with counsel for FDIC-R regarding revised Agreement resolving real estate issues and review redline version of main agreement and assignment agreement (.5); review letter from U.S. Department of Justice regarding victim impact letters (.1).

		0.60	159.00	KDM
Jul-05-14	[Asset analysis and recovery] Email counsel regarding plan to file consent to intervention.	0.10	26.50	GFG
	[Asset analysis and recovery] Strategize with team members, including special insurance counsel, regarding response to St. Paul Mercury's motion to intervene to pursue declaratory relief action (.5).	0.50	132.50	KDM
Jul-07-14	[Asset analysis and recovery] Review and approve response to motion to intervene regarding bond.	0.20	53.00	MME
	[Asset analysis and recovery] Research and draft complaint against officers and directors of Montgomery Asset Management, LLC.	3.70	980.50	GFG
	[Asset analysis and recovery] Prepare for and attend telephone conference with the FDIC's counsel, Al Curley, regarding insurance related issues and regarding issues in FDIC agreement (1.3); conferences with counsel and Receiver regarding intervention and issues related to 2012 bond (0.6); draft response to motion to intervene and file (1.6).	3.50	927.50	GFG
	[Asset disposition] Exchange multiple emails with real estate counsel and realtor regarding certain changes to be made to the contract for the sale of the Longboat Key property, the escrow agents to hold the deposits and the net	0.50	132.50	KDM

sale proceeds, and the status of the buyer's execution of the revised contract (.5).

	[Asset analysis and recovery] Emails with forensic accountant regarding records obtained from Foremost Legal regarding funds paid by PFG, review certain of those records including spreadsheet of receivables, and work on investigating those transfers (.3); work with team members on revising and finalizing Response to St. Paul Mercury's Motion to Intervene to pursue declaratory relief action pursuant to financial institution bond (.4); exchange emails with team members, including Receiver and special insurance counsel, regarding final revisions to the Response, review final version of Response, and coordinate finalizing and filing it with the Court (.3).	1.00	265.00	KDM
	[Case administration] Emails from investors regarding Victim's Impact Statement to be provided to U.S. Attorneys' Office and those statements (.2); telephone call to one investor regarding question regarding Victim Impact Statement (.1)	0.30	79.50	KDM
Jul-08-14	[Asset analysis and recovery] Telephone call with counsel in Venezuela regarding status and strategy.	0.40	106.00	MME
	[Asset disposition] Email from and telephone call to counsel for Amerisave regarding its desire to foreclose on the Price residence, the equity in the property, and our efforts to market the property for sale given the estimated value of the property (.3).	0.30	79.50	KDM
	[Asset analysis and recovery] Strategize with Receiver and team members regarding bases for claims against certain third parties and insurance policies (.2); emails with J. Price regarding scheduling a call with A.L. Price (.1); confer with Receiver and team members regarding complaint against SCAN International and its principals, previous telephone call with A.L. Price and need for further information from him, and coordinate	1.00	265.00	KDM

finalizing of complaint to include additional claim (.4); review Scheduling Order based on Joint Preliminary Report and Discovery Plan, send to special insurance counsel, and coordinate with special insurance calendaring of deadlines and discovery period (.2); emails with special insurance counsel and Receiver regarding scheduling of deposition of Receiver (.1).

	[Case administration] Review latest revised draft of real estate agreement proposed by counsel for FDIC-R and compare it to the last circulated draft and discuss with team members and the Receiver (.4); exchange emails with counsel for FDIC-R regarding the Receiver's consideration of the latest drafts of the agreement (.2).	0.60	159.00	KDM
	[Asset analysis and recovery] Review/edit Lwis Complaint with information from Venezuela counsel (.6); phone conference with Venezuela counsel (.3).	0.90	238.50	MDV
	[Asset analysis and recovery] Draft Complaint against SCAN and its principals for fraudulent transfers and other causes of action.	3.10	465.00	AF
	[Asset analysis and recovery] Confer with Guy Giberson regarding 2012 complaint against MCBI and Travelers D&O policy.	0.50	112.50	MCE
Jul-09-14	[Asset analysis and recovery] Review and revise partial settlement agreement and assignment from FDIC.	1.00	265.00	MME
	[Case administration] Review Insurance companies sur reply.	0.50	132.50	MME
	[Asset analysis and recovery] Review motion for leave to file surreply seventh application for fees filed by two insurers and review file regarding issues raised in surreply (0.3); review local rules regarding surreply (0.2); conference with counsel and Receiver regarding motion and proposed surreply (0.2).	0.70	185.50	GFG

	[Asset analysis and recovery] Review and revise Complaint against SCAN International and its principals and coordinate further revisions and additions (1.6); strategize with team members regarding certain claims alleged in, and to be added to, the Complaint and factual bases for those claims (.3).	1.90	503.50	KDM
	[Case administration] Review life insurance companies' motion to file Surreply to our response to their objection to the Receiver's latest Fee Application, review the proposed Surreply, and strategize with Receiver regarding whether and how to respond thereto (.3); review victim impact statement of investor submitted to U.S. Attorney's office for the S.D. Ga. (.1).	0.40	106.00	KDM
	[Asset analysis and recovery] Conference regarding claim against SCAN for foreclosure of Longboat Key property (0.3); Research regarding claims for complaint (1.2); Continue to draft Complaint against Scan (2.6); Conference regarding the Complaint (0.2).	4.30	645.00	AF
	[Asset analysis and recovery] Analyze possible claims against SCAN.	0.40	80.00	RML
Jul-10-14	[Asset analysis and recovery] Review and revise Complaint against Osama Lewis.	0.60	159.00	MME
	[Asset analysis and recovery] Review emails and impact statement provided by investor and email comments to counsel.	0.20	53.00	GFG
	[Asset disposition] Emails with realtor and real estate counsel regarding the prospective buyer's failure to execute the revised contract for the sale of the Longboat Key property, additional offers received, determining whether to abandon the pending offer and entertain those new offers, and determining the amount of our counter offers (.3).	0.30	79.50	KDM
	[Asset analysis and recovery] Continue reviewing and revising Complaint against SCAN International and its principals and	1.40	371.00	KDM

coordinate further revisions and additions (.9); strategize with team members regarding recent telephone call from A.L. Price regarding facts underlying the Complaint (.2); review recent case law regarding insured v. insured exception in context of FDIC case and strategize with special insurance counsel (.3).

[Asset analysis and recovery] Finalize Lwis complaint for Receiver's review (.1); strategize with Receiver regarding same (.1).

0.20

53.00

MDV

[Asset analysis and recovery] Phone call from Price regarding bank account statements.

0.20

30.00

AF

Jul-11-14

[Asset analysis and recovery] E-mail correspondence with counsel in Venezuela regarding status and strategy (.4); meeting with counsel regarding FDIC property agreement (.2).

0.60

159.00

MME

[Asset analysis and recovery] Finish reviewing and revising Complaint against SCAN International and its principals and coordinate further revisions to various counts and strategize regarding possible additional count (1.2); strategize with team members regarding claims against Giardina and Zegalia and the Evanston Insurance policy, claims against MCBI and its 2012 Directors and Officers and the preparation of complaints against those parties (.7); gather and review forensic reports related to transfers between Receivership Defendants and MB&T and MCBI and strategize regarding evidence in support of claims against various third parties, insurance policies and the financial institution bond (.5); emails with special insurance counsel regarding deadline to serve Initial Disclosures and work on gathering all documents relevant to their claims for purposes of disclosures and coordinate sending them to special insurance counsel (.5); work with team members on strategy, formulating claims, and gathering evidence in support of claims against MCBI and its 2012 officers and directors, review certain documents and forensic analyses and provide to M.C. Espenkotter for purposes of

4.00

1,060.00

KDM

preparing Complaint (.9); review letter and Subpoena from counsel for various investors directing the Receiver's appearance to provide testimony at trial in one of the FSC Securities FINRA arbitration and coordinate confirmation of Receiver's availability and calendaring of the appearance date (.2).

	[Case administration] Meet with Receiver regarding FDIC-R's latest revisions to the agreement resolving all real estate disputes (.2); exchange emails with counsel for the FDIC-R regarding status of Receiver's consideration of FDIC-R's latest revisions to the real estate agreement, review those revisions with the Receiver and strategize regarding further revisions to propose, and prepare and send email to counsel for FDIC-R regarding proposed revisions (.5); follow up on status of FDIC-R's consideration of our revisions to the global settlement proposal and strategize with Receiver and team members regarding filing another Motion for extension of time to file Reply to FDIC-R's Objection to Receiver's Plan or possible withdrawal of Motion and coordinate preparation of Motion for extension (.4).	1.10	291.50	KDM
	[Asset analysis and recovery] SCAN: Revise Complaint against SCAN.	2.80	420.00	AF
	[Asset analysis and recovery] Call from Carl Roland regarding documents to send to prove investment (0.2).	0.20	30.00	AF
Jul-14-14	[Asset analysis and recovery] Review new case regarding business judgment rule in Georgia.	0.50	132.50	MME
	[Asset analysis and recovery] Conferences regarding MAM claims and related claims against MCBI and its directors and officers for conduct in 2012.	3.50	927.50	GFG
	[Asset disposition] Emails from and to realtor for Longboat Key property regarding latest efforts to contact potential purchaser who submitted the highest offer, other prospective	0.20	53.00	KDM

purchasers, and further negotiations with realtors for certain of those purchasers (.2).

[Asset analysis and recovery] Emails with local counsel in Georgia and discuss with Receiver filing of complaint against O. Lwis (.2); strategize with Receiver and team members regarding Complaint against SCAN International and its principals (.3); email from special insurance counsel regarding recent case law applicable to claims asserted against third parties, review case law and confer with Receiver and team members regarding effect of law on those claims (.5).	1.00	265.00	KDM
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[Case administration] Discuss with Receiver and team members preparation of Response to life insurance companies Motion for leave to file Surreply to our Reply to their objection to the Receiver's latest fee application and coordinate preparation of Response (.1); email from counsel for FDIC-R regarding the Partial Settlement Agreement and Assignment Agreement with the FDIC-R resolving issues related to certain real properties, revise those Agreements and discuss certain issues with the Receiver, and send revise drafts to counsel for the FDIC-R (.8); strategize with team members regarding the FDIC-R's claims against Price and against FDIC-R and coordinate forensic investigation into funds in certain accounts of PFG for purposes of continued negotiations with FDIC-R (.3); coordinate following up with counsel for FDIC-R regarding their consideration of the global settlement agreement and obtaining consent to further extension of time to file Reply to FDIC-R's objections to the Receiver's plan while the FDIC-R considers the settlement, and send email to counsel for SEC seeking consent to Motion for further extension of time (.2).	1.40	371.00	KDM
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[Asset analysis and recovery] Continue reviewing documents produced by Bank of America for bank statements for PFG account (1.0); gather documents and print copies for analysis (.3).	1.30	97.50	pl
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Jul-15-14	[Asset analysis and recovery] Meet with counsel regarding FDIC potential agreement and Insurance issues (.4); e-mails regarding offer for Venezuelan farm and meeting with counsel regarding same (.3).	0.70	185.50	MME
	[Asset analysis and recovery] Review email from insurance counsel regarding Georgia case (0.2); review case and respond with analysis regarding pending and potential claims (0.2).	0.40	106.00	GFG
	[Asset analysis and recovery] Telephone conference with FDIC's counsel, Al Curley, regarding issues related to FDIC agreement and other related issues including insurance and 2012 claims (0.8); conference with counsel regarding strategy (0.6); emails with counsel for the FDIC (0.4); conference regarding extension of time regarding distribution plan (0.2); revise motion for extension of time (0.4); emails with counsel regarding insurance related issues for 2010 claims (0.7).	3.10	821.50	GFG
	[Asset disposition] Emails to and from realtor regarding latest offer to purchase the Longboat Key property, review the proposed contract, discuss with Receiver, and direct realtor to reject the offer (.3).	0.30	79.50	KDM
	[Asset analysis and recovery] Review analysis from forensic accountant of funds transferred from MB&T and from investors to certain accounts of Price held in the name of PFG, exchange emails with forensic accountant regarding certain follow up issues, and strategize with team members regard the forensic accountant's initial analysis and related issues (.9).	0.90	238.50	KDM
	[Case administration] Emails from counsel for SEC regarding consent to further extension of time to file Reply in support of Receiver's Motion to approve the claims process and distribution plan to provide additional time for the FDIC-R to consider the latest version of the global settlement (.1); telephone calls to and from counsel for FDIC-R regarding the	2.00	530.00	KDM

Receiver's latest revision to the real estate agreement, including the provisions regarding the deadline to sell the Longboat Key property, the choice of law provisions, and other provisions (.5); meetings with Receiver and team members regarding G. Giberson's regarding recent call with counsel for FDIC-R regarding their consideration of the global settlement agreement, their position with respect to the claims against certain insurance policies and the bond, their strategy for defending against St. Paul Mercury's declaratory relief action, and various other matters (.5); coordinate having special insurance follow up with FDIC-R's counsel to discuss demand letter to be sent to insurance carrier (.2); revise and finalize Motion for further extension of time to file reply in support of Motion to approve claims process, insert information from counsel for the FDIC-R, discuss the Motion with the Receiver, prepare and finalized proposed Order granting Motion, and coordinate filing the Motion with the Court (.4); confirm procedure for submitting proposed Orders to the Court, coordinate sending proposed Order to the judge's law clerk, and review email to the law clerk submitting Order (.1); email from counsel for FDIC-R with revised version of real estate agreement that he submitted to his client and review latest changes (.2).

[Asset analysis and recovery] Phone conference with Venezuelan counsel (.2); strategize with Receiver (2) strategize with Venezuelan counsel regarding service of process and Hague convention documents (.3).

0.70

185.50

MDV

Jul-16-14

[Asset analysis and recovery] Meeting with counsel regarding status of FDIC issues (.3); review and execute Long Boat Key Property Addendum to sales contract (.5); telephone call with investor regarding status (.3).

1.10

291.50

MME

[Asset analysis and recovery] Review Court's order on motion to approve distribution procedure and review receivership order regarding same.

0.20

53.00

GFG

[Case administration] Research and continue drafting response to motion to file surreply and affidavit of the Receiver.	2.20	583.00	GFG
[Asset disposition] Emails with realtor regarding recent communications with purchaser who offered the highest purchase price for the Longboat Key property, the signed offer, and moving forward with finalizing the sales contract (.2); review the purchasers latest signed offer and exchange emails with real estate counsel regarding updating of sales contract (.3); review the revised contract, discuss with the Receiver, coordinate execution by Receiver and sending to real estate counsel to have buyer countersign the contract (.4).	0.90	238.50	KDM
[Asset analysis and recovery] Review further analysis from forensic accountant of transfers from investors to accounts of PFG at certain financial institutions and strategize with team members regarding forensic accountant's findings and effect on claims against third parties and defenses to potential claims against the Estate (.5); review Complaint against O. Lwis and discuss certain allegations and causes of action with team members (.5); continue reviewing and revising second draft of Complaint against SCAN and its principals, strategize with team members regarding certain Counts and factual allegations and theories of recovery, and coordinate further revisions and additions (3.9); review and revise further revision to the Complaint, strategize regarding further causes of action to allege, and coordinate preparation of additional counts (1.4); strategize with team members regarding the Receiver's claims under certain D&O and E&O insurance policies, factual basis for those claims, and obtaining input from special insurance counsel and exchange emails regarding scheduling call with insurance counsel (.3); review letter from party to investor FINRA action with Subpoena to Receiver requesting documents and review Subpoena, discuss with team member, and coordinate calendaring of deadline to respond (.2).	6.80	1,802.00	KDM

	[Case administration] Review Order denying Motion to approve claims process and distribution plan without prejudice and denying Motion for extension of time to file reply in support of that Motion as moot and discuss with Receiver and team members (.2); coordinate and assist with preparation of Receiver's Eighth Status Report (.5).	0.70	185.50	KDM
	[Asset analysis and recovery] (Reduced time) Phone call to forensic accountant regarding transfers to SCAN International (0.1); Conference regarding piercing the corporate veil of Scan International (0.1); Research regarding piercing the corporate veil (0.8); Revise Complaint against SCAN for transfers and add counts for fraudulent transfers against money had and received and piercing the corporate veil (4.8); Conferences regarding case strategy and review of Complaint (0.9).	6.70	1,005.00	AF
	[Asset analysis and recovery] Confer with Guy Giberson regarding complaint against MCBI for 2012 misconduct and Travelers policy.	0.80	180.00	MCE
	[Asset analysis and recovery] Review forensic accounting summary and edit complaint against MCBI.	0.50	112.50	MCE
	[Asset analysis and recovery] Conference call regarding insurance coverage.	0.40	90.00	MCE
Jul-17-14	[Asset analysis and recovery] Telephone call with counsel and insurance counsel regarding 2012 policies and causes of action (.6); review and revise Scan Complaint (1.3); conferences with counsel regarding same (.4).	2.30	609.50	MME
	[Case administration] Revise response to motion for surreply.	0.50	132.50	MME
	[Asset analysis and recovery] Review subpoena from Respondent in FSC arbitration, emails with counsel regarding related issues.	0.20	53.00	GFG
	[Asset analysis and recovery] Conference call	1.70	450.50	GFG

regarding insurance related issues, revise complaint against MAM.

[Asset analysis and recovery] Emails and review and revise draft agreement with FDIC (0.2); emails and conference regarding FDIC's revisions of the Receiver's changes to the agreement (0.4).	0.60	159.00	GFG
[Case administration] Revise response to motion to file surreply and affidavit of the Receiver (0.7); review respective backup documents (0.2).	0.90	238.50	GFG
[Asset disposition] Emails with real estate counsel regarding additional page for the Receiver to sign on the contract for the sale of the Longboat Key property and coordinate having Receiver sign that page and sending it to real estate counsel (.2); emails with realtor regarding buyer's status of posting deposit with escrow agent and countersigning the contract (.1).	0.30	79.50	KDM
[Asset analysis and recovery] Teleconference with Receiver and various team members including special insurance counsel to strategize regarding the Complaint against the 2012 officers and directors of MCBI and MB&T and the corresponding Travelers D&O policy, the Complaint against the managers of MAM and the Evanston policy, the declaratory relief action brought by St. Paul Mercury for the financial institution bond and the FDIC-R's position and strategy, and the actions brought by the life insurance companies, the disclosures and discovery requests being prepared, and the efforts to agree upon the facts and expedite the resolution of those actions (.8); work on gathering documents needed to prepare the Complaint against the 2012 officers and directors and strategize with team members regarding various officer and directors and their actions (.4); review forensic summary of transfers from the Receivership Entities to MCBI and MB&T and exchange emails with special insurance counsel and other team	3.40	901.00	KDM

members (.2); strategize regarding responding to FSC's Subpoena for documents in FINRA action brought by certain investors (.2); review and revised latest draft of Complaint against SCAN International and its principals and coordinate further revisions (.9); discuss with Receiver the Complaint and certain revisions to be made (.3); review and analyze the forensic summary regarding transfers between SCAN and the Receivership Defendants (.2); strategize with Receiver and team members regarding employing counsel in Guatemala to assist with service of SCAN and its principals and the procedures for effecting such service (.4).

[Asset analysis and recovery] (Life Insurers' Actions) Work on gathering information and documents needed for purposes of Initial Disclosures to be filed in the life insurance company actions and exchange emails with special insurance counsel regarding the Disclosures and the additional information and documents to reference (.4); emails to and from special insurance counsel regarding certain proposed disclosures regarding the Receiver's claims and applicable law and discuss with the Receiver (.2); review and revise draft of Initial Disclosures, discuss with Receiver revisions to made and send revised draft to special insurance counsel to finalize and file with the Court (.5); review the Initial Disclosures filed by Genworth, Household Life and Protective Life and discuss with Receiver and team members (.5).	1.60	424.00	KDM
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[Asset analysis and recovery] (SCAN) Revise Complaint and add a count for fraud (3.8); Email to potential local counsel in Guatemala regarding terms of employment (0.2).	4.00	600.00	AF
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[Asset analysis and recovery] (SCAN) Phone call from forensics accountant regarding transfers from PFG to SCAN (0.2); Email from and Jorge Luis regarding representation in Guatemala (0.2).	0.40	60.00	AF
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Jul-18-14	[Asset analysis and recovery] Review and	0.30	79.50	MME
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approve discovery in Life Insurance Actions and confer with counsel.

[Asset disposition] Email from realtor contract for sale of Longboat Key property signed by the buyer and his submission of the deposit, and review signed contract (.2); emails with real estate counsel and the realtor regarding latest communications with the buyer, the status of receiving the deposit, and certain provisions regarding cancellation and default and review those provisions (.2).	0.40	106.00	KDM
[Asset analysis and recovery] (Insurers Claims) Emails with special insurance counsel regarding proposed discovery requests to send to the life insurance companies, review and revise the proposed document requests, requests for admission, and interrogatories (.7); confer with Receiver regarding those requests and exchange emails with special insurance counsel regarding finalizing and sending out discovery requests (.2).	0.90	238.50	KDM
[Asset analysis and recovery] Emails with Jim Price regarding telephone call attempts from A.L. Price, need to recharge account with Securus so A.L. Price can make further calls, and issues to be discussed regarding claims against third parties (.2); coordinate recharging account with Securus and receive confirmation of payment of balance and amount credited to account (.2); telephone call with J. Chapman regarding various issues related to evidence he is gathering for his clients' claims against FSC Securities, the upcoming meeting with A. Price, and related matters and strategize with team members regarding the investors' claims against FSC and the meeting with Price (.6); emails from J. Chapman regarding list of issues discussed and to follow up on, documents and information requested, and preparing for direct examination of the Receiver in FSC FINRA arbitration hearing, and search for certain records requested by J. Chapman (.4).	1.40	371.00	KDM

	[Case administration] Review and revise Response to Insurance Companies' Motion for Leave to File Surreply to the Receiver's Reply to the Insurance Companies' Objection to the Receiver's Seventh Fee Application, and review and revise the supporting Declaration of Receiver, and discuss with Receiver (.3); review email from counsel for FDIC-R with revised Settlement Agreement, begin reviewing revision and strategize with team members (.5); emails with counsel for the FDIC-R regarding the Receiver's consideration of the FDIC-R's latest revision to the real estate agreement, discuss that revision with the Receiver, and convey to counsel the Receiver's approval (.3); emails with investor regarding victim impact statement submitted to U.S. Attorney's Office and the possible sentence of A.L. Price in criminal action (.2); assist with preparation of the Receiver's Eighth Status Report (.3).	1.60	424.00	KDM
	[Asset analysis and recovery] SCAN: Revise Scan complaint (0.7); Prepare for phone call with Price regarding Complaint against SCAN (0.3).	1.00	150.00	AF
	[Asset analysis and recovery] Email from and to potential Guatemala counsel regarding scheduling phone conference.	0.10	15.00	AF
Jul-20-14	[Case administration] Emails with website manager regarding renewal of domain names for the Receivership website and approval renewal (.1).	0.10	26.50	KDM
	[Asset analysis and recovery] Prepare Hague documents.	0.80	212.00	MDV
	[Case administration] Draft Receiver's Eighth Status Report for the period May 1, 2014 through July 31, 2014 (3.6); discuss all components of the receivership case with the receivership team (1.0); review court papers for various third-party actions, for litigation with the life insurance companies, for litigation with the FDIC and determine case status for each (1.9).	6.50	1,722.50	CP

Jul-21-14	[Asset analysis and recovery] Review e-mail regarding farm operations and potential offer (.5); telephone call with counsel and Venezuelan counsel regarding offer and property issues in Venezuela (.8); meet with counsel regarding SCAN strategy (.1).	1.40	371.00	MME
	[Asset analysis and recovery] Emails with FDIC's counsel and conference with the Receiver and co-counsel regarding position with respect to proposed revisions to agreement.	0.30	79.50	GFG
	[Asset analysis and recovery] Conferences regarding claims regarding 2012 conduct of MCBI and its directors and officers and issues related to derivative claims.	0.30	79.50	GFG
	[Asset disposition] Teleconference with Receiver and Venezuela counsel regarding the latest offer to purchase the corn farm and the equipment on that farm, strategy for making a counteroffer, converting the bolivares to dollars, the language necessary for a Court Order approving the sale, and related issues, and the status of our efforts to obtain the cooperation of O. Lwis and the Complaint filed against him (.8); discuss with Receiver preparation of Motion to approve the sale of the corn farm (.1); prepare Motion to approve the sale and the proposed Order (1.3).	2.20	583.00	KDM
	[Asset analysis and recovery] Meet with Receiver and team members regarding latest revision to the Complaint against SCAN International and its principals, strategize regarding having the Complaint translated and served on Defendants and utilizing counsel in Guatemala and the Receiver's private investigator and coordinate and assist with making further revisions to the Complaint (.4); telephone call to prospective counsel in Guatemala regarding the scope of the engagement including service of Complaint and Summons on SCAN and its principals and settlement negotiations with those Defendants, and strategize regarding law governing service of process and effecting service in accordance	1.10	291.50	KDM

with Guatemala law (.5); emails with Jim Price regarding scheduling call with A. Price discuss various claims against third parties and to confirm certain facts in support of those claims (.2).

[Asset analysis and recovery] (Life Insurers' Claims) Emails with special insurance counsel's officer confirming all deadlines to respond to the Insurers' discovery requests and for the Insurers to respond to our discovery requests (.2).	0.20	53.00	KDM
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[Case administration] Continue assisting with preparation of Receiver's Eighth Status Report (1.9).	1.90	503.50	KDM
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[Asset analysis and recovery] Continue to revise SCAN Complaint (0.5); Conference with M. Damian and K. Murena regarding Complaint (0.1).	0.60	90.00	AF
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[Asset analysis and recovery] Phone call with potential counsel in Guatemala regarding representation.	0.40	60.00	AF
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[Case administration] Assist with preparation of Eighth Status Report.	0.30	45.00	AF
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[Asset analysis and recovery] Research derivative actions (1.2); draft memorandum regarding same (0.8); edit complaint against MCBI for 2012 misconduct(1.2).	3.20	720.00	MCE
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Jul-22-14	[Asset analysis and recovery] Meet with counsel regarding FDIC agreement (.2); e-mail correspondence with Venezuelan counsel regarding potential sale, status and strategy (.6); review and revise complaint against MCBI regarding 2012 activity and insurance demand (1.4).	2.20	583.00	MME
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[Asset analysis and recovery] Revise complaint against MAM directors and officers and distribute to co-counsel and insurance counsel for their comments.	2.90	768.50	GFG
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[Asset disposition] Exchange emails with real estate attorney and realtor regarding the status of the buyer's delivery of deposit for the sale of the Longboat Key property, the buyer's cancellation of his meeting with the realtor to deliver the deposit due to his illness, and coordinating rescheduling meeting with buyer to pick up the deposit (.3); email from Venezuela counsel regarding increased offer to purchase the corn farm and discuss with Receiver the offer and the status of preparing the Motion to approve that sale and proposed Order (.3); exchange emails with Venezuela counsel regarding the terms of the offer, clarifying certain items, resolving certain issues, and strategy regarding mechanics and logistics of the transfer and conversion of the sale proceeds (.4); revise Motion to approve the sale of the corn farm to reflect certain terms of the latest offer, discuss conversion rate and certain language in proposed Order and send email to Venezuela counsel regarding language to include in Order to facilitate the sale and transfer and conversion of the sale proceeds (.4); emails from Venezuela counsel regarding the game plan and procedures for finalizing the sale of the corn farm, including resolving certain issues with the title and certain third parties with claimed interests in the property, and further terms to be negotiated in connection with the sales contract, including the commission to the party who introduced the buyer, and discuss the issues raised by counsel with the Receiver (.2).	1.60	424.00	KDM
[Asset analysis and recovery] Continue assisting with preparation of Receiver's Eighth Status Report (.5).	0.50	132.50	KDM
[Asset analysis and recovery] Strategize regarding responses to demand letters to A&D Hospitality and its principals and affiliates, follow up on preparation of Complaint against them, and review forensic reports of transfers between Defendants and those principals and affiliates (.4); exchange emails with forensics accountant regarding preparation of updated consolidated forensic report of transfers between Defendants and A&D and its	2.90	768.50	KDM

principals and affiliates (.2); review updated consolidated report of transfers and assist with formulating claims to include in Complaint based on forensic analyses (.4); emails with forensic accountant regarding documents supporting forensic report of transfers with A&D and its principals and affiliates, review those documents, and strategize regarding claims against those parties (.4); telephone call from A. Price regarding various issues related to claims against A&D and its principals and affiliates, strategize with team members regarding information provided by A. Price, and coordinate incorporating it into Complaint (.4); telephone call from A. Price regarding the Receiver's claims against SCAN International and its principals and confirmation of certain supporting facts, confer with Receiver and team members and coordinate finalizing and filing of the Complaint (.4); receive report regarding status of negotiations with Nelson Mullins and strategize with team members regarding completing negotiations and deadline file the complaint against that firm (.2); review draft of complaint against control persons and financial advisors of Montgomery Asset Management and strategize with team members coverage under the Evanston E&O insurance policy and obtaining the input of special insurance counsel (.5).

[Case administration] Strategize with Receiver and team members the FDIC-R's latest revisions to the global settlement agreement and our response to certain new terms that they inserted and other terms they deleted (.9).	0.90	238.50	KDM
[Asset analysis and recovery] Provide information for Eighth Status Report.	0.10	15.00	AF
[Asset analysis and recovery] A&D: Email to C. Perez containing all information on A&D for purposes of drafting complaint.	0.10	15.00	AF
[Asset analysis and recovery] Phone call with Price regarding SCAN Complaint.	0.30	45.00	AF

	[Asset analysis and recovery] Review subpoenas and all documents produced by Anfe Woodfrum and A&D Hospitality and prepare summary of transaction between those parties and PFG (2.4); review letter from Price describing A&D loan from PFG (0.1); review forensic analysis of transfers to Woodrum, Van Nus and A&D Hospitality (0.2); telephone call with Price regarding Woodrum investment in PFG and in A&D and regarding A&D loan and MB&T Bank (0.3); draft list of documents and information needed to prepare complaints against various parties (0.4); provide new information gained from Price for revision of forensic analysis (0.3); review revised forensic analysis of transfers to and from Woodrum, Van Nus and A&D Hospitality (0.5).	4.20	1,113.00	CP
	[Asset analysis and recovery] Confer with Guy Giberson regarding 2012 misconduct complaint.	0.40	90.00	MCE
Jul-23-14	[Asset analysis and recovery] Email correspondence with Venezuelan counsel regarding proposed sale of corn farm (.4); review and revise draft motion to approve sale of corn farm (.4).	0.80	212.00	MME
	[Asset analysis and recovery] Telephone conference with Al Curley, FDIC's counsel, regarding issues in common (.6); conferences with counsel and the Receiver regarding FDIC agreement issues (.8).	1.40	371.00	GFG
	[Asset analysis and recovery] Conferences with counsel regarding strategy and claims for 2012 conduct of MCBI and D&O's and research on certain potential legal issues (.9); telephone conference with insurance counsel regarding coverage issues related to 2012 claims, review coverage analysis prepared by insurance counsel, review research prepared by Amanda Fernandez, conduct additional research regarding same legal issues and email litigation group with respective analysis and material research findings in connection with 2012 cases (2.6).	3.50	927.50	GFG

<p>[Asset analysis and recovery] Work with team members on preparation of Complaint against 2012 directors and officers of MCBI and MB&T and strategize regarding defendants to name and confirming whether any were investors of Defendants (.4); emails with special insurance counsel regarding Protective Life's and Household Life's Initial Disclosures (.2); review and make further revisions to Complaint against SCAN and its principals in accordance with the requests of the Receiver and coordinate making additional revisions and preparing the Complaint for filing (.9); review Order granting St. Paul Mercury's Motion to Intervene in the main receivership and strategize with team members regarding defending against claims alleged the declaratory relief action and the FDIC-R's strategy for defending against those claims (.4); review affidavit of expert regarding duties and breaches of Nelson Mullins, the applicable law, the claims alleged by the Receiver in the Complaint against that firm, and the damages to the Receivership Entities and strategize with team members regarding claims against Nelson Mullins (.4); emails with special insurance counsel regarding the forensic analysis in support of our claims against the financial institution bond and the 2012 officers and directors and strategize with team members regarding those claims (.2).</p>	2.50	662.50	KDM
<p>[Case administration] Begin reviewing and revising first draft of Eighth Status Report and discuss status of preparation with Receiver (.5); emails with counsel for the SEC regarding the preparation of a Permanent Injunction against A. Price and schedule a telephone call to further discuss this and related matters (.3).</p>	0.80	212.00	KDM
<p>[Asset analysis and recovery] MCBI: Conference regarding comparative fault (0.1). Research regarding comparative fault liability in Georgia for negligence and intentional torts (1.8); Draft email memorandum to G. Giberson regarding comparative fault liability in Georgia (0.3)</p>	2.20	330.00	AF

	[Asset analysis and recovery] Draft Complaint against A&D Hospitality and Adam Van Nus (3.2); review demand letters to same and response from same (0.3); review forensic analysis regarding transfers to same (0.4); review transfers to fraudulent transferees (0.3); review case law regarding fraudulent transferees, money lent, money had and unjust enrichment (2.5).	6.70	1,775.50	CP
	[Asset analysis and recovery] Strategize regarding complaint against MCBI and edit same.	1.50	337.50	MCE
Jul-24-14	[Asset analysis and recovery] E-mail correspondence regarding Venezuelan property (.3); review and revise complaint against MCBI and its D's & O's regarding 2012 activity and exchange e-mails and meet with counsel regarding same (1.0).	1.30	344.50	MME
	[Case administration] Telephone call with SEC regarding status.	0.50	132.50	MME
	[Asset disposition] Email from realtor regarding wire transfer of deposit to real estate counsel's trust account and follow up with realtor and counsel to determine if funds were received (.2); revise Motion to approve sale of corn farm in accordance with the Receiver's requests (.3).	0.50	132.50	KDM
	[Asset analysis and recovery] Telephone call from counsel for FDIC assisting FBI with calculating the restitution amount for Price's sentencing regarding transfers between investors and the Defendants, the forensics analyses of those transfers and updates based on new information from investors and Price, the FDIC's upcoming meeting with Price, and scheduling a meeting to discuss the updated forensics and further information obtained during FDIC's investigation (.5); emails with counsel for SEC regarding rescheduling call to discuss the terms of the proposed permanent injunction against A.L. Price and the status of the Receiver's efforts to recover assets (.1); telephone call with counsel for SEC and	3.10	821.50	KDM

Receiver regarding the foregoing matters, the law supporting certain of the Receiver's claims against third parties, the status of settlement negotiations with the FDIC-R, and the terms of the proposed agreements (.5); make final revisions to the Complaint against SCAN and its principals and coordinate filing it with the Court (.2); review memorandum of law and cited cases regarding comparative law statute in Georgia and strategize with team members regarding effect on the Receiver's claims against various third parties (.8); strategize with team members regarding potential claim against auditors of MB&T, the auditors' communications with A.L. Price, the applicable statute of limitations and negotiating a tolling agreement (.3); emails to and from Jim Price regarding setting up a call with A.L. Price (.1); strategize with team members regarding bring claims against certain investors who received net gains and against fraudulent transferees or entering into tolling agreements based on applicable statutes of limitations (.2); emails with J. Chapman regarding the Receiver's testimony at the last FINRA arbitration hearing, preparation for hearing in another FINRA arbitration, and coordinate date and time of Receiver's testimony for that hearing (.2); strategize regarding claims being alleged in Complaint against A&D Hospitality and its principal (.2).

	[Asset analysis and recovery] Revise and finalize SCAN complaint.	1.40	210.00	AF
	[Asset analysis and recovery] Confer with Guy Giberson and Melanie Damian regarding complaints, status and strategy.	0.30	67.50	MCE
Jul-25-14	[Asset analysis and recovery] Review e-mail and analysis from insurance counsel and respond.	0.40	106.00	MME
	[Asset analysis and recovery] Conference regarding additional issues related to defenses in 2012 and other claims (.3); emails with insurance counsel regarding update on relevant issues (.2).	0.50	132.50	GFG

[Asset disposition] Exchange emails with realtor and real estate counsel regarding the prospective buyer's default under the contract to purchase the Longboat Key property for failure to timely provide the deposit, and strategize regarding preparing and sending Notice of Default and continuing to market the property for sale (.2).	0.20	53.00	KDM
[Asset analysis and recovery] Exchange emails with special insurance counsel regarding comparative fault issue and strategize with team members further research to be done (.3); emails to and from insurance counsel regarding recent communications with counsel for St. Paul Mercury in declaratory relief action on the Financial Institution Bond and strategize with team members regarding responding the complaint and other scheduling matters (.2); work with team members on preparation of Complaint against MCBI and its directors and officers for 2012 misconduct (.2); review first draft of Complaint and review emails with insurance counsel regarding their analysis of the claims and the applicable D&O policy (.8); email from special insurance counsel regarding his recent call with counsel for the FDIC-R regarding its strategy for responding to St. Paul Mercury's declaratory relief complaint on the Bond and continue working on our strategy in that case (.2); multiple emails with special insurance counsel regarding basis for the Receiver's claim against the Bond and the supporting forensic analysis (.2).	1.90	503.50	KDM
[Case administration] Telephone calls from and to investor regarding the status of the enforcement action and the Receivership (.2); continue reviewing and revising first draft of the Receiver's Eighth Status Report, inserting additional information and status updates and coordinating further additions and revisions (3.3); receive report regarding recent call with counsel for FDIC-R regarding their revisions to the latest draft of the settlement agreement, the FDIC-R's position with respect to the Bond, and the FDIC-R's claims against the Evanston policy and strategize with team	3.90	1,033.50	KDM

members regarding revisions to the FDIC-R latest draft of the agreement (.4).

[Asset analysis and recovery] MCBI: Research regarding asserting a comparative fault defense in a breach of fiduciary duty claim (1.0). Research regarding whether breach of fiduciary duty is a tort (1.4); Draft email memorandum to G. Giberson regarding breach of fiduciary duty as a a tort (0.3).

2.70

405.00

AF

[Asset analysis and recovery] SCAN: Email to potential counsel in Guatemala regarding his purposed engagement letter.

0.10

15.00

AF

Jul-27-14

[Case administration] Continue reviewing and revising the Receiver's Eighth Status Report and coordinate further revisions to two sections on claims against third parties (2.1).

2.10

556.50

KDM

[Case administration] Revise Receiver's Eighth Status Report based on review of current status of financial institutions bond litigation.

1.00

265.00

CP

Jul-28-14

[Asset analysis and recovery] Emails with counsel regarding evidence in files of purchase of MCBI shares in 2012 (0.3); review respective spreadsheet documents (0.2).

0.50

132.50

GFG

[Asset disposition] Multiple emails with realtor and real estate counsel regarding the purchaser's default of the deposit obligation under the contract to purchase the Longboat Key property, the contact information for the purchaser, and the type of default notice to be sent (.3); review and approve default notice and coordinate sending to purchaser (.2).

0.50

132.50

KDM

[Asset analysis and recovery] Continue working with team members on gathering factual support for claims against certain third parties, including claims against MCBI and its 2012 officers and directors, review documents produced by the FDIC-R and the auditor of MB&T, and prepare and send team members analysis of certain financial records of MCBI (1.1); work with team members on compiling

1.40

371.00

KDM

list of all pending litigations against third parties and other claims to be brought against third parties and other sources of recovery (.3).

[Case administration] Make further revisions to draft of the Receiver's Eighth Status Report and present to Receiver for review and revisions (1.4).	1.40	371.00	KDM
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[Asset analysis and recovery] SCAN: Email from potential Guatemala counsel regarding retainer agreement (0.1); Email to another potential Guatemala counsel regarding the retainer agreement (0.1). Phone call with that counsel regarding the retainer agreement (0.2).	0.40	60.00	AF
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[Asset analysis and recovery] Phone call with special insurance counsel regarding complaint against MCBI fro 2012 misconduct.	0.20	45.00	MCE
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[Asset analysis and recovery] Review SCAN International documents and conduct search online for possible addresses for SCAN International USA, SCAN International Nicaragua, SCAN International Guatemala, Edgar Stuardo Maroquin Archila and Ronaldo Enrique Rodriguez Garcia for purposes of obtaining an address to serve Defendants with the Complaint.	2.00	150.00	pl
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[Asset analysis and recovery] Prepare Civil Cover Sheet and Summonses regarding the SCAN International Defendants and send to local counsel for filing.	0.60	45.00	pl
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Jul-29-14	[Case administration] Review and revise Eighth Status Report and meeting with counsel to discuss.	1.60	424.00	MME
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[Asset analysis and recovery] Conferences regarding evidence supporting 2012 claims against MCBI and shares purchase.	0.60	159.00	GFG
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[Asset analysis and recovery] Continue reviewing financial records produced by various parties and strategize with team members regarding evidence in support of	1.80	477.00	KDM
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claims against MCBI and its officers and directors for their 2012 misconduct (.9); assist with locating registered agent of SCAN and its principals for purposes of preparing and serving Summonses and Complaint and review Accurant reports for those parties (.4); review and revise Civil Cover Sheet for Complaint against SCAN and its principals, send to local counsel in Georgia and follow up regarding the filing of that Complaint (.3); report to Receiver status of filing of Complaint against SCAN and its principals (.1); emails with Receiver and team members regarding scheduling call to discuss all pending litigation matters and complaints being prepared (.1).

[Case administration] Follow up on negotiations with prospective counsel for the Receiver in Guatemala for purposes of serving and negotiating with SCAN and its principals and coordinate preparation of Application to Employ counsel in Guatemala (.4); revise the Receiver's Eighth Status Report in accordance with the Receiver's requests, discuss with the Receiver further revisions to the Report and the Exhibits, and work on preparing and updating the Exhibits (.9).	1.30	344.50	KDM
[Asset analysis and recovery] Correspondence with Venezuela counsel regarding Lwis complaint.	0.20	53.00	MDV
[Asset analysis and recovery] SCAN: Email to Venezuelan counsel regarding retainer agreement with potential Guatemalan counsel.	0.10	15.00	AF
[Asset analysis and recovery] Research California case law and statutes regarding community property interests in fraudulently obtained property and standard for defeating community property interests when restitution is due to fraud victims (1.3); draft email summarizing research findings (1.0).	2.30	609.50	CP
[Asset analysis and recovery] Conference call with insurance counsel regarding status and strategy.	0.70	157.50	MCE

	[Asset analysis and recovery] Work on exhibits for the Receiver's Eighth Interim Status Report.	0.60	45.00	pl
Jul-30-14	[Asset analysis and recovery] Telephone call with insurance counsel regarding status on various pending matters (.7); review FDIC comments to settlement agreement (.3); e-mails regarding Nelson Mullins claims and tolling agreement (.3).	1.30	344.50	MME
	[Case administration] Review schedules to Status Report and status of pending matters.	0.40	106.00	MME
	[Asset analysis and recovery] Telephone conference with insurance counsel, Cary Steklof, regarding 2012 claims (0.6); conference call with litigation group regarding strategy as to insurance issues (1.1).	1.70	450.50	GFG
	[Asset analysis and recovery] Prepare for interviews with Aubrey Lee Price and interview of Mr. Price by John Chapman, counsel for certain investors.	5.20	1,378.00	GFG
	[Asset disposition] Review Notice of Default sent to purchaser under the contract to purchase the Longboat Key Property based on failure to pay initial deposit and discuss with realtor and real estate counsel contact information used for Notice and status of the purchaser's business (.2).	0.20	53.00	KDM
	[Asset analysis and recovery] Teleconference with M. Damian and team members to strategize, follow up on work being done, and assign projects in connection with various claims and actions, including claims against MCBI and its 2012 officers and directors, claims against MAM and its officers, claim against the financial institution bond, claims against D&O liability insurance policies, claim against errors and omission policy, claims brought by life insurance companies, and the status of global settlement negotiations with the FDIC-R and negotiations related to the parties' respective claims against certain insurance policies and the bond (1.1);	1.80	477.00	KDM

strategize with team members regarding information discussed during calls with A.L. Price and coordinate gathering further information to be discussed with him (.2); emails with special insurance counsel regarding his recent communications regarding scheduling a settlement conference, confirm available dates with Receiver and select date (.2); receive update from special insurance counsel regarding communications with counsel for St. Paul Mercury regarding the deadline to respond to Complaint and communications with counsel for FDIC-R regarding its response to the Complaint and discuss with Receiver documents related to FDIC-R position and arguments against Complaint (.2); review emails with counsel for St. Paul Mercury confirming agreement to new deadline to respond to the Complaint and coordinating preparation of Stipulation to extend deadline (.1).

[Case administration] Continue working on revising and updating Exhibits to Receiver's Eighth Status Report, including the Investor and Creditor List and the Inventory of Assets, confirm certain amounts reflected in updated reconciliation of the receivership accounts and discuss all Exhibits with Receiver (1.1); finalize and coordinate filing of Report and all Exhibits (.2); receive update regarding negotiations with potential counsel in Guatemala for purposes of action against SCAN and its principals and locating other potential counsel who will agree to more favorable terms of engagement, coordinate contacting Venezuela counsel and discuss with Receiver (.2); review communications with counsel for FDIC-R regarding latest draft of the global settlement agreement and issues in dispute (.1); strategize with Receiver regarding further revisions to be made to the FDIC-R's latest draft of the global settlement agreement, certain disputed issues to overcome, and game plan if no agreement can be reached (.4); begin reviewing proposed revision to the global settlement agreement (.3); email from counsel for FDIC-R regarding final revisions to real estate settlement agreement and assignment

2.80

742.00

KDM

agreement, review those final drafts of the agreements, propose to counsel one minor revision, and discuss with Receiver (.5).

[Asset analysis and recovery] SCAN: Email from Guatemala counsel regarding retainer (0.1); Email from Venezuelan counsel recommending new Guatemalan counsel (0.1).	0.20	30.00	AF
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[Case administration] Prepare detailed list of all pending claims and actions in the receivership action for counsel for SEC.	2.00	530.00	CP
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[Asset analysis and recovery] Conference call with insurance counsel regarding status and strategy.	0.70	157.50	MCE
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[Asset analysis and recovery] Review and update exhibits for the Receiver's Eighth Status Report for final review by KDM prior to filing (1.5); file electronically (.2).	1.70	127.50	pl
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[Asset analysis and recovery] Begin to review and gather additional bank documents from Trade Station, JP Morgan Chase and Fidelity for purposes of analysis of transfers.	1.00	75.00	pl
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[Asset analysis and recovery] Communicate with local counsel in Georgia regarding status of filing the SCAN International complaint.	0.20	15.00	pl
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Jul-31-14 [Asset analysis and recovery] E-mails with insurance counsel regarding status and strategy (.2); review and comment on FDIC proposal for revisions to settlement agreement (.8).	1.00	265.00	MME
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[Asset analysis and recovery] Prepare for interview with Aubrey Lee Price and conduct interview of Mr. Price (5.9); prepare for interview of bank experts hired by Montgomery Bank, Steven Powell and Steven Roundtree and further interview with Mr. Price (7.6).	13.50	3,577.50	GFG
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[Asset analysis and recovery] Emails to and from and telephone call from local counsel in Atlanta regarding status of filing of Complaint	0.20	53.00	KDM
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against SCAN International and its principals and its compliance with local rules and discuss timing of filing with Receiver (.2).

[Case administration] Coordinate sending Receiver's Eighth Status Report to the website manager to be posted on the receivership website with all Exhibits and review website to confirm that it is up to date (.2); continue strategizing with Receiver regarding FDIC-R's proposed revisions to global settlement agreement and review certain of those revisions and determine appropriate response (.5); emails to and from counsel for FDIC-R regarding final revisions to real estate agreement and confirming that all parties are prepared to execute it, and discuss with Receiver (.2).	0.90	238.50	KDM
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HOURLY TOTALS:

707.30

\$161,862.00

ATTORNEY/PARALEGAL SUMMARY

NAME	INITIALS	HOURS	RATE	AMOUNT
Melanie E. Damian	MME	66.00	\$265.00	\$15,582.00
Peter F. Valori	PFV	10.70	\$265.00	\$2,835.50
Guy F. Giberson	GFG	195.90	\$265.00	\$51,913.50
Kenneth D. Murena	KDM	238.30	\$265.00	\$60,870.50
Melissa Damian Visconti	MDV	14.50	\$265.00	\$3,842.50
Amanda Fernandez	AF	87.50	\$150.00	\$13,125.00
Cassandra Perez Murena	CP	27.20	\$265.00	\$7,208.00
David M. Carnright	DMC	27.10	\$150.00	\$1,605.00
Mary Claire Espenkotter	MCE	13.20	\$225.00	\$2,970.00

Russell M. Landy	RML	0.40	\$200.00	\$80.00
Paralegal	pl	26.50	\$75.00	\$1,830.00

DISBURSEMENTS

	Pacer Photocopy	122.30
May-01-14	Postage 3 @ 0.70	2.10
	Postage 4 @ 0.49	1.96
May-20-14	Postage 13 @ 6.48	84.24
May-28-14	Mediation Fee Retainer for Receiver v. Nelson Mullins & Scarborough LLP	2,000.00
May-30-14	Photocopies and Production of documents 4/10/14 Bank of America	31.17
	FedEx Shipment Aubrey Price 5/22/14	20.96
May-31-14	Lexis Nexis Search for Tim Cannady	4.00
Jun-02-14	Expert J. Sherrill Fee for Mediation 5/8/14	2,175.00
Jun-04-14	Postage 1 @ 0.48	0.48
Jun-11-14	Filing Fee: Pro Hac Vice for Jason Mazer	150.00
Jun-18-14	Postage 1 @ 11.68	11.68
Jun-24-14	FedEx Shipment Aubrey Price 6/10/14	23.05
	FedEx Shipment Aubrey Price 6/10/14	20.45
	FedEx Shipment Clerk of Court 6/30/14	20.96
	FedEx Shipment Michael Brooks 7/2/14	25.84
Jun-27-14	Filing Fee: Certified Order Approving the Sale of Longboat Key	12.50
Jun-30-14	USDA Clerk of Courts KM Homes 5/23/14	10.00
Jul-22-14	Mediation Fee: Receiver v. Nelson Mullins & Scarborough	220.00
	FedEx Shipment Aubrey Price 7/14/14	12.02
	FedEx Shipment Michael Brooks 7/16/14	18.47
	FedEx Shipment Aubrey Price 7/2/14	12.02
	Witness Fee: Mary P. Hunneycutt - Void	-27.02
Jul-30-14	Postage 1 @ 0.48	0.48
Jul-31-14	Filing Fee: Complaint SCAN	400.00
	Filing Fee: Action against A&D Hospitality	400.00
	Totals	\$5,752.66

Total Fee & Disbursements**\$167,614.66**

Previous Balance

556,731.91

Balance Now Due**\$724,346.57**

Terms: Balance Due Upon Receipt

Payments received after the billing date of Jul 31/14 may not be included on this statement.

TAX ID Number 20-1324240